

S. SEANAH DIXON
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HIGH DESERT STATE PRISON
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INDIAN SPRINGS, NV,
89070

TONEY A. WHITE
NDOC NO. 1214172
HDSP
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*** EMERGENCY COMPLAINT ***

PLAINTIFFS IN PRO SE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SEANAH DIXON AND
TONEY A. WHITE,

PLAINTIFFS,

VS.

S. SALKOFF, TERRENCE JACKSON, ERNESTO TORRES, R. WILLIAMS, EDGAR LOPEZ-MAYA AND F. LOUVERTURE, CORRECTIONS OFFICERS AT HDSP; STATE OF NEVADA; CALVIN JOHNSON, WARDEN AT HDSP; GREG PICCIAZZINI, JEREMY BEAN AND JULIE WILLIAMS (MATOUSEK), ASSOCIATE WARDENS ("AWs") AT HDSP; D. ONTIVEROS, JAY BARTH, UNKNOWN SYDIONGO, UNKNOWN MCKEEHAN, CORRECTIONS LIEUTENANTS AT HDSP; GUSTAVO SANCHEZ, UNKNOWN STEWART, UNKNOWN FINLEY AND UNKNOWN MOORE, CORRECTION SERGEANTS AT HDSP; STACY BARRETT AND UNKNOWN YATES, CASEWORKERS AT HDSP; WILLIAM OBLAK, ROBERT ASHCRAFT, UNKNOWN MARTINEZ, MATTHEW LEONG, ROBERT JARRETT AND R. GARCIA, SENIOR CORRECTIONS OFFICERS ("SCOs") AT HDSP; DAVID RIVAS, M.D., AND WILSON FULLA BERNALES, M.D.,

CIVIL ACTION NUMBER

EMERGENCY COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER COLOR OF STATE LAW (42 U.S.C. § 1983); VIOLATION OF THE REHABILITATION ACT AND AMERICAN'S WITH DISABILITIES ACT (29 U.S.C. § 794; 42 U.S.C. § 12101, ET. SEQ.); STATE SUPPLEMENTAL CAUSES (1) ASSAULT AND BATTERY; (2) DEFAMATION/SLANDER/ LIBEL; (3) GROSS NEGLIGENCE; (4) CONVERSION OF PROPERTY; (5) INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS; (6) FRAUD/FRAUDULENT CONCEALMENT/OBSTRUCTION OF JUSTICE; (7) MEDICAL MALPRACTICE; (8) PROFESSIONAL MALPRACTICE/ NEGLIGENCE; AND DEMAND FOR JURY TRIAL.

PHYSICIANS AT HDSP; J. ABCL AND
UNKNOWN O'CONNOR, PSYCHOLOGISTS
AT HDSP; MIRIAM VIZCARRA-RODRI-
GUEZ, NURSE AT HDSP; AND JOHN/
JANE DOES 1 THRU 150, INCLUS-
IVE,

DEFENDANTS.

I. INTRODUCTION

1. PLAINTIFFS' EXISTENCE AS STATE PRISONERS CONFINED AT THE HDSP EXEMPLIFY THOSE OF THE TWILIGHT ZONE WHERE IN REALITY AND FACT THEIR HUMAN, CIVIL AND CONSTITUTIONAL RIGHTS ARE NON-EXISTENT AND TRAMPLED ROUGHSHOD AT WILL BY ROGUE OFFICIALS WHO SELECTIVELY INTERPRETE AND APPLY GOVERNING LAW AND REGULATIONS TO THEIR BENEFIT, ARE DEFIANT AND INDIFFERENT TO THE RULE OF LAW, INSENSITIVE TO HUMAN SUFFERINGS AND WHO HAVE A COMPLETE LACK OF EMPATHY, REGARD OR COMPASSION FOR THE LIVES, CUSTODY AND TREATMENTS OF PLAINTIFFS LESS ALONE THEIR CONSTITUTIONAL RIGHTS. AMIDST VARIOUS FLAGRANT VIOLATIONS OF PLAINTIFFS CIVIL, HUMAN AND CONSTITUTIONAL RIGHTS AS WELL AS SEVERAL STATE-LAW TORTS, PLAINTIFFS BRING THIS EMERGENCY ACTION TO REDRESS SAID VIOLATIONS, SEEK JUST COMPENSATION AND TO SECURE INJUNCTIVE RELIEF FOR THE PRESERVATION OF LIFE, TO PREVENT WANTON AND UNNECESSARY PAIN AND SUFFERINGS AND IN WHICH TO PROHIBIT FURTHER EGREGIOUS AND CAPRITIOUS CONSTITUTIONALLY OFFENSIVE ATROCITIES FROM DEFENDANTS.

II. JURISDICTION AND VENUE

2. THIS CASE INVOLVES CONTROVERSIES BETWEEN PARTIES INHABITING, EMPLOYED AT OR RESIDING IN INDIAN SPRING NEVADA, COUNTY OF CLARK. UNDER NEVADA REVISED STATUTE § 41.0322 AND 28 U.S.C. §§ 1331, 1343 AND 1391 THIS COURT IS VESTED WITH JURISDICTION OVER THE STATE AND FEDERAL CLAIMS AND VENUE IS PROPER IN THIS COURT.

3. PLAINTIFFS EXPRESSLY OBJECT TO ANY FEDERAL REMOVAL OF THIS CASE PURSUANT TO 28 U.S.C. § 1441.

III. CONDITIONS PRECEDENT

4. ALL CONDITIONS PRECEDENT HAVE BEEN ATTEMPTED, PERFORMED AND/OR EXECUTED.

IV. PARTIES

5. PLAINTIFFS SEANAH DEXON¹¹ AND TENEY WHITE, (BOTH MEMBERS OF THE LGBTQ COMMUNITY) ARE BOTH U.S. CITIZENS, PRISONERS CONFINED AT HDSP AND RESIDENTS OF THE STATE OF NEVADA AND COUNTY OF CLARK.

6. DEFENDANT CALVIN JOHNSON IS THE WARDEN OF HDSP AND ITS CHIEF EXECUTIVE OFFICER. HE IS CHARGED WITH RESPONSIBILITY OF IMPLEMENTING LOCAL PROCEDURES AND ENSURING THE CONSTITUTIONAL AND HUMANE TREATMENT AND CARE OF PRISONERS ENTRUSTED TO HIS CARE. HIS RESPONSIBILITY FURTHER ENTAILS PROPER SUPERVISION, TRAINING, HIRING, ASSIGNMENT AND DISCIPLINE OF ALL STAFF UNDER HIS CHARGE AND FURTHER ENSURING THAT THEY CONFORM TO THE CODE OF ETHICS CODIFIED AT AR 339 AND THAT STAFF WHO WITNESS FLAGRANT VIOLATIONS OF AR 339 AND 707 AND ABUSES OF POWER AND AUTHORITY BY OTHER EMPLOYEES NOT CONCEAL, COVER UP AND REMAIN SILENT TO PROTECT THE OFFENDER BUT RATHER FIND COURAGE TO REPORT THEM TO PROTECT DEPARTMENT AND PEACE OFFICER INTEGRITY, ENSURE TRANSPARENCY, MAINTAIN INTERNAL DISCIPLINE AND ORDER, PERMIT DISCIPLINE OF THE VIOLATOR AND HOLD THEM ACCOUNTABLE. HE IS SUED IN HIS INDIVIDUAL AND OFFICIAL CAPACITY.

7. DEFENDANT STATE OF NEVADA IS A SOVEREIGN STATE OPERATING MULTIPLE ARMS AND BRANCHES OF ITS GOVERNMENT INCLUDING NEVADA DEPARTMENT OF CORRECTIONS WHICH OPERATES UNDER COLOR OF STATE LAW AND AUTHORITY.

1. MS. DIXON IS A MALE-TO-FEMALE TRANSGENDER AND SEEKS THAT THE COURT AND ALL PARTIES ADHERE TO RESPECTABLE PROPER PRONOUN BY ADDRESSING HER IN THE FEMININE CONTEXT.

8. DEFENDANTS GARY PICCININI, JEREMY BEAN AND JULIE WILLIAMS (MATOUSEK) ARE AWIS AT HDSP. AS AWIS ITS THEIR JOBS TO ENFORCE AND ENSURE THAT ALL SUBORDINATE SUPERVISORS UNDER THEIR SUPERVISION AND CONTROL ADHERE TO ALL APIS AND OPERATIONS PROCEDURES ("OP'S") AND CONSTRAIN THEIR STAFFS CONDUCTS TO THE PERIMETERS OF AR 339. THEY WERE ALSO RESPONSIBLE FOR THE ADEQUATE TRAINING, DISCIPLINE, SUPERVISION AND ASSIGNMENTS OF DEFENDANTS D. ONTIVEROS, UNKNOWN SYDONGO, JAY BARTH AND UNKNOWN MCKEEHAM. THEY ARE SUED IN THEIR INDIVIDUAL AND OFFICIAL CAPACITIES.

9. DEFENDANTS D. ONTIVEROS, JAY BARTH, UNKNOWN SYDONGO AND UNKNOWN MCKEEHAM ARE CORRECTIONS LIEUTENANTS AT HDSP. DEFENDANTS EUSTAVO SANCHEZ, UNKNOWN STEWART, UNKNOWN FINLEY AND UNKNOWN MOORE ARE CORRECTIONS SERGEANTS AT HDSP. DEFENDANTS WILLIAM OBLAK, ROBERT ASHCRAFT, UNKNOWN MARTINEZ, MATTHEW LEONE, R. JARRETT AND UNKNOWN GARCIA ARE SCOS AT HDSP. DEFENDANTS S. SALKOFF, TERENCE JACKSON, ERNESTO TORRES, R. WILLIAMS, EDGAR LOPEZ-MAYA AND F. LOUVERTURE ARE CORRECTIONS OFFICERS AT HDSP. STACY BARRETT AND UNKNOWN YATES ARE CASE WORKERS AT HDSP.

10. DEFENDANTS SANCHEZ, JARRETT, TORRES, FINLEY, YATES, MCKEEHAM, WILLIAMS AND LOUVERTURE ARE SUED IN THEIR INDIVIDUAL CAPACITY. DEFENDANTS MOORE, BARTH, STEWART, OBLAK, ASHCRAFT, GARCIA, MARTINEZ, LEONE, SALKOFF, JACKSON, LOPEZ-MAYA, ONTIVEROS, SYDONGO, PICCININI, BEAN, WILLIAMS (MATOUSEK) AND BARRETT ARE SUED IN BOTH THEIR INDIVIDUAL AND OFFICIAL CAPACITIES.

11. DEFENDANTS DAVID RIVAS AND WILSON BERNALDES ARE/WERE PHYSICIANS AT HDSP. DEFENDANTS J. ABEL AND UNKNOWN O'CONNOR ARE CLINICAL PSYCHOLOGISTS AT HDSP. DEFENDANT MIRIAM VIZCARRA-RODRIGUEZ IS A NURSE AT HDSP. THEY ARE SUED IN THEIR INDIVIDUAL CAPACITY.

12. SOME/NAME DOES 1 THRU 150 ARE VARIOUS ADMINISTRATORS, SERGEANTS, LIEUTENANTS, SCOS, MEDICAL, DENTAL, MENTAL HEALTH, PHARMACY STAFF AND NURSES AND OFFICERS AT HDSP WHOM WERE INVOLVED IN THE EVENTS AND INCIDENTS DESCRIBED HEREIN. THEY ARE SUED UNDER THE PSEUDONYMS OF DOES DUE TO PLAINTIFFS CURRENT INABILITIES TO IDENTIFY THESE DEFENDANTS BY NAME. UPON DISCOVERING THEIR IDENTITIES AND CAPACITIES THEY WILL BE AMENDED TO THE PLEADINGS.

13. AT ALL TIMES CONSISTENT WITH THIS COMPLAINT EACH DEFENDANT ACTED UNDER COLOR OF STATE LAW AND AUTHORITY.

V. FACTS - GENERAL

14. PLAINTIFFS, BOTH PRISONERS AT HDSP ARE SERVING LIFE SENTENCES CURRENTLY WITH THE NDOC AND SUFFER FROM SUPPOSEDLY SERIOUS MEDICAL CONDITIONS WHICH IF LEFT UNMONITORED AND UNTREATED ARE CERTAIN TO PRODUCE DEADLY CONSEQUENCES.

15. MS. DIXON IS AFFECTED WITH A UNKNOWN HEART CONDITION, HIGH BLOOD PRESSURE, SPINAL INJURIES, POSSIBLE THROAT AND COLON CANCER, AND A NEUROLOGICAL CONDITION ALL WHICH CAUSE HER CONSTANT FATIGUE, WEAKNESS, SYNCOPY, PERFUSE SWEATING, LACK OF APPETITE, BREATHING DIFFICULTIES, HEART AND CHEST PAINS, CONSTANT INTOLERABLE AND EXCRUCIATING MIGRAINS AND UNBEARABLE DISTRIBUTED INTENSE PAINS THROUGH HER NECK, BACK, CALVES, LEGS AND FEET. SHE CONSISTENTLY HAS OBSERVED AND REPORT BLOOD IN HER STOOL AND SUFFERS FROM A CONDITION THAT ROUTINELY IMPAIRS HER BALANCE. AS A TRANSGENDER WHO PROTECTS FEMININE CHARACTERISTICS, SHE IS ON AND HAS REMAINED ON FOR QUITE DURATION HORMONE REPLACEMENT THERAPY WHICH ALSO WARRANTS ENDOCRINOLOGY MONITORING AND CONSULTS. SHE HAS BEEN CONSULTED WITH A CARDIOLOGIST HOWEVER NOT ALL OF HIS SPECIALTY ORDERS HAVE BEEN ADHERED TO BY NDOC.

16. PLAINTIFF WHITE ON THE OTHER HAND SUFFERS FROM A LIFE LONG CHRONIC SEIZURE DISORDER, CHRONIC ASTHMA AND A CONDITION KNOWN AS COCCIDIOID MYCOSIS ("COCCI" AKA VALLEY FEVER). HE TOO SUFFERS FROM SPINAL AND A BACK CONDITION RENDERED PAINFUL WHEN MADE TO WEAR FLAT OR SHOWER SHOES LONG TERM. HE HAS SUFFERED AND BEEN TREATED FOR SEIZURES SOME 36+ YEARS TO DATE BEING EVALUATED AND TREATED BY IN EXCESS OF 200+ PHYSICIANS AND NEUROLOGISTS WITH SEIZURE CONTROL AT 97% EFFICACY WITH USE OF THE ANTI-EPILEPTIC DRUG ("AED") GABAPENTIN (AKA NIVERONTIN).

17. WHITE HAS REMAINED DIAGNOSED AND TREATED FOR ASTHMA FOR OVER A QUARTER CENTURY WITH INHALERS. HIS COCCI CONDITION IS FATAL IF NOT MONITORED AND TREATED WITH HIS ANTI-FUNGAL POSACONAZOLE WHICH IS WARRANTED FOR LIFE LONG DURATION COUPLED WITH COCCI SPECIALIST CONSULTS. HIS COCCI CONDITION HAS RESULTED IN ST SURGERIES TO HIS LEFT WRIST TO CONTROL THE INFECTION AND A LEFT WRIST BRACE FOR ANTI-FLEXION WHICH CAUSES RELAPSE. WHEN NOT PROVIDED HIS BRACE OR ANTI-FUNGAL HIS INFECTION PAINFULLY RELAPSES. HIS RAPIDLY DECLINING VISION PLACES HIM AT INCREASED RELIANCE ON HIS PRESCRIPTION EYEWEAR WHICH WHEN NOT PROVIDED CAUSE EXCRUCIATING MIGRAINS. FOR CLOSE TO 40 YEARS HE HAS BEEN UNDER PSYCHIATRIC CARE BOTH IN CUSTODY AND WHILE AT LIBERTY REMAINING ON A LITANY OF POWERFUL ANTI-PSYCHOTICS TO COPE WITH HIS PSYCHOSIS.

18. PLAINTIFFS COLLECTIVE DISABILITIES WHICH INCLUDE SEIZURE DISORDER, ASTHMA, SCHIZOPHRENIA, PTSD, GRAVE DEPRESSION, HALLUCINATIONS, COCCI, LEFT WRIST IMMOBILITY, SPINAL AND NECK CONDITIONS, CANCER AND OTHERS ARE AND HAVE BEEN DOCUMENTED IN THEIR MEDICAL RECORDS RETAINED BY DEFENDANTS FAR PRIOR TO AND AT ALL TIMES MATERIAL TO THIS ACTION AND BOTH PLAINTIFFS ARE REGARDED AS HAVING SAID DISABILITIES BY THE PUBLIC ENTITY NDOC.

19. AT ALL TIMES MATERIAL TO THIS ACTION DEFENDANTS JOHNSON AND DIRECTOR OF NURSING DOES HAD IN PLACE AND PRACTICE AND TACTICALLY APPROVED AND CONDONED NURSING AND HDSP FACILITY PROTOCOLS WHICH PERMITTED ALL MEDICAL AND NURSING STAFF TO ELUDE BEING PROPERLY IDENTIFIED BY STAFF OR THE VERY PATIENTS THEY ABUSED AND FOR PURPOSES OF LITIGATION AND INTERNAL GRIEVANCES. THIS FOSTERED A CULTURE AND ATMOSPHERE WHICH FUELED, ENCOURAGED AND CONDONED THE PROPENSITY OF MEDICAL STAFF TO ENGAGE IN ABUSIVE MEDICAL PRACTICES STEALTHILY, WITHOUT FEAR OF ACCOUNTABILITY WHILE AT THE SAME TIME PREVENTING PATIENTS SUBJECTED TO THE CRUEL AND INSENSITIVE ABUSES FROM IDENTIFYING THEIR ABUSERS. WHILE ALTHOUGH SWORN PEACE OFFICERS ARE REQUIRED TO WEAR NAME PLATES CLEARLY IDENTIFYING THEMSELVES, MEDICAL STAFF CONVERSELY ARE PRIVILEGED TO CIRCUMVENT DISCLOSING THEIR IDENTITY.

A. MEDICAL TREATMENT OF SEANAH DIXON

20. DIAGNOSED WITH GENDER IDENTITY DISORDER / GENDER DYSPHORIA ("GID/GD") MS. DIXON HAS REMAINED ON HORMONE REPLACEMENT THERAPY / HORMONE THERAPY ("HRT/HT") FOR EXTENDED DURATION. PURSUANT TO INTERSTATE COMPACT AGREEMENT SHE WAS TRANSFERRED TO AND REMAINED UNDER CUSTODY OF THE CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION ("CDCR") FOR SOME 16+ YEARS WHERE SHE MET CO-PLAINTIFF WHITE.

21. IN CDCR SHE WAS COMPREHENSIVELY AND CONSISTENTLY EVALUATED, TREATED AND MONITORED FOR HER MANY MEDICAL MALADIES. SHE FREQUENTLY CONSULTED WITH A ENDOCRINOLOGIST FOR HER HRT/HT MONITORING AND ROUTINE TESTINGS INCLUDING BLOOD WORKS. ULTIMATELY, IN APPROXIMATELY 2015 SHE WAS RETURNED TO NDOC CUSTODY. HER MEDICAL RECORDS ACCOMPANIED THE RETURN PLACING MEDICAL DEFENDANTS ON NOTICE OF HER NEED FOR CONTINUITY OF CARE AND ROUTINE FOLLOW UPS WITH SPECIALTY CLINIC CONSULTS INCLUDING ENDOCRINOLOGY AMONGST OTHERS²¹. SHE HAS REMAINED IN NDOC CUSTODY SINCE HER CALIFORNIA RETURN.

22. SINCE HER RETURN AND TODATE, SHE HAS SUBMITTED A SMORGASBORD OF REQUESTS AND COMPLAINTS (BOTH WRITTEN AND VERBAL) TO NDOC MEDICAL DEFENDANTS AND DOE NURSES PERTAINING TO AND INVOLVING EACH OF THE AILMENTS SET FORTH IN PARAGRAPH 15, SUPRA. WHILE MOST, IF NOT ALL, HAVE FALLEN ON DEAF EARS, OF THE FEW IN WHICH PHYSICIAN ORDERS DID MATERIALIZE IN DIAGNOSTIC EFFORTS TO RULE OUT, SUBSTANTIATE AND TREAT THE COMPLAINED OF CONDITIONS, THOSE ORDERS HAVE BEEN DEFIANTLY IGNORED, DEFIED AND SUBJECT TO PROTRACTED DELAY TODATE TO HER DETRIMENT.

23. NAMELY, A AFP MARKER TEST, MRI AND CT SCAN HAVE PREVIOUSLY BEEN ORDERED BUT AS OF TODATE HAVE NOT BEEN PERFORMED TO DIAGNOSE AND TREAT POSSIBLE COLON AND THROAT CANCER, SPINAL/NECK INJURIES/CONDITIONS AND RESULTING INTOLERABLE PAINS AND WANTON SUFFERINGS.

2. AR 639 PROHIBITS INMATES FROM POSSESSING NDOC MEDICAL RECORDS ABSENT COURT ORDER AND SOLELY PERMITS ACCESS TO SAME FOR REVIEW AND NOTE TAKING PURPOSES ONCE A YEAR FOR 1 SINGLE HOUR. THIS EFFECTIVELY PREVENTS MS. DIXON'S ABILITY TO ARTICULATE FACTS WITH SPECIFICITY AS THEY RELATE TO STANDING ORDERS BEING DEFIED AND TREATMENTS BEING DENIED WHICH MAY IN FACT BE THE CONTRIBUTING CAUSES OF HER RAPID DEGRADATION. SHE SEEKS THAT THIS COURT ORDER THEIR DISCLOSURE UNDER SEAL AND IN CAMERA FOR ITS REVIEW.

24. AS A PROTECTIVE CUSTODY TRANSGENDER ("TG") PRISONER, HISTORICALLY SHE WAS CALLED UPON TO LEVERAGE AND PLACE HER PERSONAL SAFETY AND LIFE IN JEOPARDY BY AGREEING TO BE TRANSPORTED FROM ELY STATE PRISON FOR A ENDOSCOPY WITH DANGEROUSLY VIOLENT GENERAL POPULATION PRISONERS FOR THE SAKE OF RECEIVING HER ENDOSCOPY OR ALTERNATIVELY REFUSING IT IN THE INTEREST OF HER LIFE AND SAFETY AND BEING LEFT UNTREATED TO SUFFER TORTURE, PAIN AND WANTON SUFFERINGS. LOGISTICS DICTATE USING HER BETTER JUDGMENT SHE CHOSE HER LIFE AND SAFETY. AS PRECISELY PREDICTED, A SECOND PC PRISONER WHO REGRETABLELY OPTED IN THE SAME TRANSPORT FOR MEDICAL TREATMENT THE SAME DAY WAS BRUTALLY ATTACKED BY 6P INMATES DURING THE TRANSPORT TO HIS DETRIMENT.

25. BY OCTOBER 2021, CONCERNS OF ESP PHYSICIANS HAD HEIGHTENED WHEN E-PATCH HEART TESTING RESULTS EMERGED. PLAINTIFF WAS EMERGENTLY TRANSPORTED TO HDSP FOR URGENT CONSULT WITH A CARDIOLOGIST. FOR A WEEK AFTER HER ARRIVAL SHE WAS HOUSED IN THE INFIRMARY. SHE WAS ASSESSED THERE AND CONTINUED HER HEART, CHEST AND BREATHING DIFFICULTY COMPLAINTS 31. SHE WAS ULTIMATELY EXAMINED BY DEFENDANT RIVAS WHO, ALTHOUGH HAVING NO EDUCATION IN CARDIOLOGY OR SPECIALTY QUALIFICATION TO DO SO, TO HER DETRIMENT PRESCRIBED PROPONOLIL AND DISCHARGED HER FROM THE CLINICAL SETTING WITH AN UNCERTAIN CARDIOLOGIST CONSULT DATE. UNKNOWN TO PLAINTIFF WAS THAT THE PROPONOLIL AS ORDERED BY DEFENDANT RIVAS WITHOUT ANY CARDIOLOGIST INPUT ACTED TO ONLY AMPLIFY HER CHEST AND HEART PAINS AND BREATHING DIFFICULTY.

26. PROVIDING MEDICAL DEFENDANTS AMPLE TIME GIVEN THE "EMERGENT NATURE" TO CONSULT HER WITH A CARDIOLOGIST AND HAVING NOT DONE SO, SHE GRIEVED. WHEN REALIZING THE DEADLY IMPLICATIONS OF PROTRACTED DELAYS IN GRIEVANCE RESPONSES AND THE INABILITY TO REMEDY HER LIFE THREATENING CONDITION TIMELY AND TAKEN INTO ACCOUNT THE LITANY OF CONCERNING AND INSENSITIVE RESPONSES AND STATEMENTS OF NURSES TO HER GRIEVANCES AND MEDICAL REQUESTS, SHE, WITH THE ASSISTANCE OF CO-PLAINTIFF HEREIN, INSTITUTED DIXON V. MINER, ET. AL., USDC (D.MEV.) CASE NO. 2:21-CV-02133 APG VCF SEEKING EMERGENT INJUNCTIVE RELIEF. THIS FILED ACTION AND OTHER PROTECTED FIRST AMENDMENT ACTIVITIES ENGAGED IN BY MS. DIXON WITH HER PARALEGAL ASSISTING CO-PLAINTIFF FORMED 1 OF SEVERAL IMPETUS FOR DEFENDANTS RETALIATIONS.

3. ADHERING TO THEIR UNDISCOURAGED PRACTICE AND CUSTOM OF DOING SO NOW BRAVELY WITHOUT FEAR OF CONSEQUENCE, MEDICAL DEFENDANTS FALSELY DOCTORED AND FORGED MEDICAL RECORDS OF PLAINTIFF TO THE CONTRARY.

27. ULTIMATELY MS. DIXON WAS CONSULTED BY THE CARDIOLOGIST WHO REALIZING THE FATAL PROSPECTS OF THE PROPRANOLOL PRESCRIBED BY UNQUALIFIED DEFENDANT RIVAS, IMMEDIATELY DISCONTINUED IT, PLACED HER ON METOPROLOL AND ORDERED SEVERAL CLINICAL DIAGNOSTIC TESTS INCLUDING TREADMILL, TABLE TILT AND STRESS TESTS AMONG OTHERS. DESPITE THE CARDIOLOGISTS DISCONTINUATION OF THE PROPRANOLOL AND PRESCRIBING METOPROLOL IMMEDIATELY UPON THE FIRST CONSULT FOR THE ASSURANCE OF HER HEALTH, DOE NURSE DEFENDANTS AND DEFENDANT RIVAS CONTINUED TO ADMINISTER THE POTENTIALLY DEADLY PROPRANOLOL AND FAILED TO BEGIN ADMINISTERING HER THE CARDIOLOGIST ORDERED METOPROLOL FOR IN EXCESS OF 2 WEEKS LATER WHILE HER SYMPTOMS AND COMPLAINTS PERSISTED. THE LIFE THREATENING DELAY IN IMMEDIATELY EXCHANGING THESE DRUGS, WHICH COULD HAVE MARKED THE DIFFERENCE BETWEEN LIFE AND DEATH IN MS. DIXON'S CASE, RESTED ADDITIONALLY IN PART AND FAULT ON THE INCOMPETENT IRRATIONAL, WIDE SPREAD AND DEEPLY ENTRENCHED POLICIES AND PRACTICES OF PHARMACEUTICAL DOES WHO KNOWINGLY PERMIT THESE EGREGIOUS DELAYS WHICH IN AND OF THEMSELVES DEMONSTRATE CALLOUS INDIFFERENCES TO PATIENT HEALTH AND LIFE.

28. IN NOTIFYING MS. DIXON OF ONE OF THE SCHEDULED TRIAD OF TESTS AND ALTHOUGH COMPLETELY UNQUALIFIED TO DO SO, NURSE DOES ERRONEOUSLY AND TO HER DETRIMENT ASSURED HER THAT SHE COULD TAKE HER HEART MEDICATION ON THE MORNING OF THE MUCH NEEDED PROCEDURE. HOWEVER AND TO THE COMPLETE CONTRARY, REALIZING SHE HAD DONE SO THE SPECIALTY CARDIOLOGIST STAFF CANCELLED HER CRITICALLY NEEDED PROCEDURE SUBJECT TO NURSE DOES RESCHEDULING IT WHICH HAS NOT OCCURRED TO DATE CAUSING HER CONTINUING SUFFERING FROM DELAY IN DIAGNOSING, TREATING AND CARING OF HER HEART CONDITION. WHILE ALTHOUGH HER CARDIOLOGIST HAS ORDERED A NEUROLOGY CONSULT AS WELL, TO DATE MEDICAL DEFENDANTS HAVE PERSISTED IN DEFYING THIS SPECIALTY ORDER AS WELL.

29. MS. DIXON HAS CONSISTENTLY AND RELENTLESSLY COMPLAINED OF HER PLIGHTS TO MEDICAL NURSE DOES AND PARTICULARLY HER EXPENDING BLOOD, BLOOD IN HER STOOL, HEART AND CHEST PAINS, DIFFICULTIES BREATHING, EATING AND SWALLOWING, POSSIBLE THROAT AND COLON CANCER⁴¹ AND EMPHASIZING THE HISTORY OF CANCER IN HER FAMILY. MEDICAL AND NURSE DOES LACKING EMPATHY OR COMPASSION PROVIDE THE SEMINAL STANDARD BOILERPLATE REPLY: "PLACED ON DR. LIST; YOU WILL BE SEEN WHEN YOUR NAME COMES UP; LIST IS LONG; PLEASE BE PATIENT" EFFECTIVELY DISMISSING HER PAIN, WANTON SUFFERING AND THE PROGRESSION OF POSSIBLE CANCER AND HEART COMPLICATIONS AS "NOT URGENT."

30. MANY EMERGENCY AND REGULAR GRIEVANCES OF MS. DIXON HAVE NOTED THE SAME RESULTS FROM MEDICAL NURSE DOES. IN EMERGENCY GRIEVANCES SHE COMPLAINED OF HEART AND CHEST PAINS, DIFFICULTY BREATHING, POSSIBLE CANCER, COUGHING UP BLOOD AND BLOOD IN HER STOOL. NURSE DOES CALLOUSLY WITHOUT EMPATHY, COMPASSION OR THE SLIGHTEST CONCERN FOR HER SUFFERING AND REPORTED CONCERNING MEDICAL CONCERNS SIMPLY REPLY "NOT AN EMERGENCY PER AR 740" S/. IN AT LEAST 2 EMERGENCY MEDICAL GRIEVANCE INSTANCES NURSE DOES DIRECTLY THREATENED MS. DIXON REPERCUSSION, DISCIPLINE AND REPRIMAND SHOULD SHE CONTINUE TO COMPLAIN AND IN THEIR EFFORTS TO SILENCE HER.

31. AS OF THE TIME OF DRAFTING THIS COMPLAINT MEDICAL DOE DEFENDANTS HAVE NOT SO MUCH AS ORDERED OR OBTAINED ORDERS FOR, LESS ALONE PERFORMED THE SIMPLEST OF BLOOD TESTING AND SCREENS AT DETECTING PROGRESSION OF AILMENTS, CANCERS, HIGH BLOOD PRESSURE OR OTHER DISEASE WHICH MAY BE THE SUSPECTED CULPRIT OF HER DETEIORATION AND WHICH COULD SO EASILY SAFEGUARD HER LIFE. TO DATE, MORE THAN 7 YEARS AFTER HER RETURN FROM CDCR AND DESPITE REPEATED REQUESTS, MEDICAL DEFENDANTS HAVE STILL NOT CONSULTED HER WITH A QUALIFIED ENDOCRINOLOGIST.

32. IN A RECENT EVENT, MS. DIXON REPORTED A "MAN DIXON" MEDICAL EMERGENCY SUMMON DUE TO INABILITY TO BREATHE AND EXCRUCIATING CHEST AND HEART PAINS. BEING VIEWED AS A NUISANCE BY MEDICAL DOES AND NURSES, SHE WAS MADE TO WAIT FOR EMERGENCY RESPONSE SOME 1 HOUR AND 9 MINUTES OUT OF PURE RESENTMENT. PUT INTO PERSPECTIVE, THATS ENOUGH TIME BY IN WHICH TO FULLY SHACKLE MS. DIXON AND HAVE HER TRANSPORTED TO THIS COURT AND HALF WAY BACK TO THE PRISON THAT IT TOOK MEDICAL DOES TO RESPOND TO A HEART/CHEST PAIN INABILITY TO BREATHE EMERGENCY MEDICAL SUMMON.

4. A CONDITION IN WHICH ANY REASONABLE PERSON OF NORMAL SENSIBILITY WOULD AGREE WARRANTS "EARLY" NOT DELAYED DETECTION FOR FAVORABLE PROGNOSIS.

5. NO PROVISION IN AR 740 EXPRESSLY DEFINES EXACTLY WHAT CIRCUMSTANCES CONSTITUTE A EMERGENCY GRIEVABLE ISSUE NOR DOES ANY PROVISION PRECLUDE VOICING BLOOD, BLOOD IN STOOL, HEART AND CHEST PAINS, BREATHING DIFFICULTIES OR POSSIBLY PROGRESSIVE CANCER AS BEING CONSIDERED A EMERGENCY BASIS. NONETHELESS, ABSENT HESITATION AND WITH HASTE MEDICAL DEFENDANTS INDISCRIMINATELY CITE AR 740 TO CONCEAL THEIR LACK OF WILLINGNESS IN PROVIDING HUMANE AND CONSTITUTIONAL CARE AND AS A MEDICAL TREATMENT BUFFER.

33. UPON NURSE DOE 1'S ARRIVAL AND IN THE PRESENCE OF DEFENDANT JARRETT AS THE UNIT SUPERVISOR, TERRIFIED AND FRUSTRATED BY THE EXPERIENCE UNDERSTAND- ABLY SHE BERATED NURSE DOE 1'S GROSSLY TARDY RESPONSE VOWING TO BELIEVE IT. NURSE DOE 1 RESPONDED "THO YOU'RE REFUSING MEDICAL TREATMENT" BEFORE EXITING COMPLETELY REFUSING MS. DIXON MEDICAL ATTENTION OR EVEN ASSESSING HER. RESULTING NOTES AND REPORTS OF NURSE DOE 1 WERE DOCTORED AND FALSIFIED. SEE FN 3, SUPRA. AS UNIT SUPER- VISOR DIRECTLY WITNESSING THIS ABUSE, DEFENDANT JARRETT HAVING THE OPPORTUNITY AND AUTHORITY TO DO SO, HAD A DUTY TO REPORT THIS EGREGIOUS VIOLATION OF NURSE DOE 1'S REFUSAL TO PROVIDE CARE TO MS. DIXON TO DEFENDANTS JOHNSON, WILLIAMS (MATOUSEK), BCAN, PATIENT, ONTARIO AND MEDICAL SUPERVISOR DIRECTOR OF NURSING DOES AND SECURE HER THE CARE CONSTITUTIONALLY GUARANTEED. DE- FENDANT JARRETT CONSCIOUSLY REFUSED AND FAILED TO DO SO EFFECTIVELY CONCEALING THIS ABUSE AND BEING COMPLICIT IN MS. DIXON'S UNCONSTITUTIONAL DENIAL OF MEDICAL CARE AND IN THE TACIT INFLECTION OF HER WANTON PAIN AND SUFFERINGS.

34. ON MARCH 31, 2022 MS. DIXON WAS INVOLVED IN A INCIDENT AS SET FORTH IN SECTION 'C' OF FACTS IN WHICH SHE WAS DETAINED AND REFUSED IN ADMINISTRATION SECREATION. IN CONJUNCTION WITH THOSE EVENTS SHE AND HER CO-PLAINTIFF ALERTED DEFENDANTS JACKSON, LOPEZ-MAYA, STEWART, BARRETT, OBLAK, ASHCRAFT MARTINEZ GARCIA AND CERTAIN DOES INCLUDING CUSTODY AND NURSE DOES OF VAULTED PRESCRIBED MEDICATIONS AND APPARATUS' CONTAINED IN HER PROPERTY THESE DEFENDANTS POSSESSED AND HAD ACCESS TO. SHE SOUGHT THEIR RETRIEVAL AND PROVISION TO HER TO PREVENT CONTINUITY OF CARE INTER- RUPTION AND THE WANTON SUFFERINGS PREDICTABLE TO BE CAUSED IN THEIR CONTINUED ABSENCES. THESE DEFEN- DANTS INTERRUPTED AND INTERFERED WITH HER PRESCRI- BED CARE BY FAILING TO COME TO HER AID IN RETURNING SAID MEDICATIONS OR BY CAUSING THEIR RETURN. AT THE TIME OF DRAFTING THIS COMPLAINT SHE HAS BEEN REFUSED HER HEART, HRT/HT AND OTHER MEDICATIONS IN HER PROPERTY FOR SOME 17 CONSECUTIVE DAYS ARBI- TRARILY AND AS RETALIATION AND PURE PUNISHMENT.

35. AS OF THE CURRENT DATE, MS. DIXON CONTINUES TO SUFFER FROM DETERIORATING HEALTH, WANTON PAIN AND SUFFERING AND HAS NOT YET BEEN SUBJECTED TO CLINICAL INVESTIGATORY TESTS TO RULE OUT HER CAUSES OF BLOOD IN STOOL AND BEING COUGHED UP, CANCER, NECK/BACK PAINS NOR HAS SHE BEEN CONSULTED WITH NEUROLOGY AND ENDOCRINOLOGY.

B. MEDICAL TREATMENT OF TONEY WHITE

36. DIAGNOSED WITH SEIZURE DISORDER AND RECEIVING THE CONTROVERSIAL AED GABAPENTIN SOME 17 YEARS PRIOR TO HIS MARCH 29, 2019 HDSP ARRIVAL, BASED ON A DRACONIAN, INDISCRIMINATE, BIASED AND PROFOUND COMMITMENT TO ERADICATE ITS USE AT HDSP MEDICAL DEFENDANTS DEvised A "AGENCY PROTOCOL" BLANKETLY EXCLUDING ITS USE WHICH TRIGGERED WHITE V. BEAN, ET. AL., USDC (D. NEV.) CASE NO. 2:21-cv-01259 RFB VCF AND WHITE V. LAUB, ET. AL., 8TH JUD. DIST. CRT. CASE NO. A-21-8388411-C, BOTH WHICH REMAIN PENDING TO DATE^{6/}. DUE TO MR. WHITE'S RESORT TO LITIGATION CALLING INTO QUESTION MEDICAL DEFENDANTS DRACONIAN BLANKET POLICY AND HIS UNRELENTING MEDICAL-RELATED GRIEVANCES, MEDICAL DEFENDANTS HAVE BLACK BAILED HIM EMPLOYING MEDICAL PRACTICE AS A TOOL OF AGGRESSION AND TO RETALIATE WHICH SERVED TO BE THE IMPETUS OF THEIR PROFOUND RESENTMENT AND ANIMOSITY AND WHICH DIRECTLY IMPACTS THE QUALITY OF HIS CARE.

37. OUT OF RESENTMENT AND SPITE, DURING THE COURSE OF JULY 21, 2021 AND JANUARY 31, 2022 AND DESPITE STANDING PHYSICIAN ORDERS PRESCRIBING THE AED GABAPENTIN 1800 MG BID (3600 MG DAILY) A MULTITUDE OF NURSE DOES ACTIVELY AND CAPRICIOUSLY INTERFERED WITH HIS ORDERED CARE DEFYING STANDING PHYSICIAN ORDERS BY SIMPLY REFUSING TO MEDICATE MR. WHITE ON A SMORGASBORD OF OCCASIONS SENSELESSLY TRIGGERING HIS OTHERWISE PREVENTABLE SEIZURES AND RESULTING INJURIES. WHEN MR. WHITE WOULD COMPLAIN TO NURSE DOES REPORTING THE RESULTING INJURIES SEEKING IMMEDIATE ASSESSMENT AND TREATMENT, NURSE DOES WOULD DELAY AND IN MANY INSTANCES FLAT OUT REFUSE HIM. VIEWING HIM, ALIKE MS. DIXON, AS A NUISANCE. ADHERING TO THEIR UNDISCOURAGED PRACTICE AS OUTLINED AT FN 3, SUPRA, RESULTING REPORTS AND MEDICAL FILE ENTRIES WERE DOCTORED AND FALSIFIED IN EFFORTS TO MINIMIZE THE SEVERITY AND GRAVITY OF NURSE DOES INDIFFERENCES AND INSULATE CULPABLE STAFF FROM DETECTION AND LIABILITY FOR THEIR AGGRESSIONS.

6. IN WHITE V. BEAN, SAID CASE CHALLENGED EVENTS FROM MARCH 29, 2019 THRU MARCH 16, 2020; WHITE V. LAUB, CHALLENGED EVENTS FROM MARCH 17, 2020 TO APPROXIMATELY JULY 21, 2021. THE CURRENT ACTION CHALLENGES VIOLATIONS RELATIVE TO MR. WHITE'S MEDICAL CARE FROM APPROXIMATELY JULY 22, 2021 THRU ITS FILE DATE.

38. BY NOVEMBER 05, 2021 IT WAS COMMON KNOWLEDGE AMONGST MEDICAL DEFENDANTS THAT MR. WHITE WAS IN FULL PROSECUTION OF WHITE V. BEAN ACTIVELY EXPOSING THE CORRUPTION, INDIFFERENCE AND COMPETENCY OF HDSP'S MEDICAL DEPARTMENT. ELABORATE SCHEMES BEGAN TO UNRAVEL CALCULATED TO UNDERMINE THE CREDIBILITY OF MR. WHITE'S OTHERWISE LUCID REPORTS AND PUNISH HIM THROUGH RETALIATION FOR DOING SO. ON NOVEMBER 05, 2021 NURSE DOE 2 FRAUDULENTLY ACCUSED MR. WHITE OF DOUBLE-DOSING. WHEN MR. WHITE CONFRONTED THE NURSES BLATANT DECEPTION AND CONCEALED ALLEGATION AND VOWED TO GRIEVE HIM NURSE DOE 2 DISPELLED BEING CONCERNED ABOUT MR. WHITE'S LAWSUIT OR A GRIEVANCE.

39. DAYS LATER MR. WHITE'S AED GABAPENTIN WAS PURPOSEFULLY WITHHELD IN THE MORNING HOURS IN TURN PROMPTING A VIOLENT SEIZURE WITNESSED BY DEFENDANTS JARRETT AND ONTIVEROS AFTER 11:00 AM. ONLY THEN DID NURSE DOES RESPOND AND MEDICATE MR. WHITE. WHILE ALTHOUGH HE FILED A SERIES OF GRIEVANCES AND MEDICAL REQUESTS AND DEFENDANTS ONTIVEROS, JARRETT, WILLIAMS, LOPEZ-MAYA, BARRETT AND ABEL AND OTHER DOES WERE AWARE OF MEDICAL DEFENDANTS ABUSIVE PRACTICES WHICH CONTINUED TO POSE A SIGNIFICANT, CLEAR AND PRESENT DANGER TO MR. WHITE'S HEALTH AND LIFE CAUSING WANTON SUFFERINGS IN THEIR VIEWS THESE UNCONSTITUTIONAL ATROCITIES WERE THE REALITIES AND CONSEQUENCES OF PRISON AND WAS SIMPLY BUSINESS AS USUAL. EACH OF THESE DEFENDANTS AWARE OF THE DIRE CIRCUMSTANCES CONFRONTING MR. WHITE FAILED TO COME TO HIS AID AND DESPITE HAVING THE OPPORTUNITY AND AUTHORITY TO DO SO CONSCIOUSLY FAILED TO INTERVENE BY CONTACTING SUPERVISOR MEDICAL DEFENDANTS, DEFENDANT JOHNSON OR OTHERS TO ENSURE MR. WHITE REMAINED RECEIVING CONSTITUTIONAL CARE AND THAT NURSE AND MEDICAL DOES PRACTICES CEASED FOR THE PRESERVATION OF MR. WHITE'S LIFE AND SAFETY. RATHER THAN REPORTING THESE DISTURBING ABUSES CANDIDLY, THEY IN FACT CONCEALED THEM TURNING A BLIND EYE ACTIVELY ORDAINING AND REMAINING COMPLICIT IN THEM.

40. BY DECEMBER 23, 2021 ANIMOSITY AND RESSENTMENT AGAINST MR. WHITE FESTERED AMONGST MEDICAL DEFENDANTS ESPECIALLY FOLLOWING THE FEDERAL COURTS NOVEMBER 19, 2021 ADMONISHMENT IN WHITE V. BEAN AND STERN THREAT OF CASE DISPOSITIVE SANCTIONS IN THE EVENT MEDICAL DEFENDANTS CONTINUED SABOTAGING MR. WHITE'S AED GABAPENTIN. ON THIS DATE DEFENDANTS BERNALES, RIVAS AND VIZCARRA-RODRIGUEZ OPTED WILLINGLY INTO A FRAUDULENT CONSPIRATORY SCHEME AIMED AT CREATING FALSE PRETEXTS TO JUSTIFY REMOVING MR. WHITE FROM HIS AED GABAPENTIN TO DIVEST THE FEDERAL COURT OF JURISDICTION AND INSULATE THEMSELVES FROM THE WRATH OF ITS CONTEMPT FINDINGS AND IMPLEMENTATION OF CASE DISPOSITIVE SANCTIONS.

41. AS PRACTICAL, THE SCHEME INCLUDED DEFENDANT VIZCARRA-RODRIGUEZ FALSELY ACCUSING MR. WHITE OF HOARDING HIS GABAPENTIN IN THE A.M. ON DECEMBER 23, 2021 BY IN WHICH TO JUSTIFY DEFENDANTS RIVAS AND BERNALES' ORDER TO DISCONTINUE MR. WHITE'S GABAPENTIN. BASED ON THE FANCIFUL EVENTS FALSE ENTRIES WERE MADE IN MR. WHITE'S MEDICAL FILE PURPORTING TO JUSTIFY A CONCOCTED BASIS TO REMOVE HIM FROM HIS AED GABAPENTIN WHEN IN ALL ACTUALITY AND FACT THE ADVERSE MEDICAL ACTION WAS MUCH MORE SINISTER, - NAMELY TO PUNISH HIM, CAUSE HARM AND SUFFERING AND ADVANCE THEIR "AGENCY PROTOCOL" OF ERADICATING THE MEDICATION'S USE AT THE FACILITY. A ORDER WAS ENTERED BY DEFENDANT BERNALES AT 0800 HOURS DECEMBER 23, 2021 TO ADMINISTER 1800 MG IN THE A.M. AND 1200 MG IN THE P.M. TO "TAPER" MR. WHITE OFF OF HIS GABAPENTIN. UPON THE FRAUDULENT TAPERING MR. WHITE BEGAN A UTANY OF COMPLAINTS AND SUFFERED SEVERAL OTHERWISE PREVENTABLE SEIZURES. HIS MEDICAL NOTES AND COMPLAINTS WERE REBUFFED.

42. ON JANUARY 11, 2022 AMONGST OTHER DAYS MR. WHITE SUFFERED A SERIOUS SEIZURE EPISODE TERRIFYING MS. DIXON WHO CALLED "HANDOWN". AMONG OTHERS DEFENDANT JARRETT RESPONDED OBSERVING THE SEVERITY OF MR. WHITE'S SEIZURE EPISODE. DEFENDANT ONTIVEROS, PRESENT IN THE UNIT TOWER, WAS ALSO NOTICED OF THE SEVERITY OF PLAINTIFF WHITE'S SEIZURE EPISODE.

7. WHO DISHONESTLY GAINED NDOC EMPLOYMENT THROUGH FRAUDULENT JOB APPLICATION ENTRIES AND WHO HAD AT LEAST 5 PUBLIC REPRIMANDS FOR VIOLATIONS OF THE MEDICAL PRACTICES ACT MADE AVAILABLE FOR PUBLIC VIEWING ON THE NEVADA BOARD OF MEDICAL EXAMINERS WEBSITE.

43. ALTHOUGH ALERTED TO MR. WHITE'S MEDICAL EMERGENCY, MEDICAL DOES TREATED HIM AS A NUISANCE FAILING TO COME TO HIS AID FOR SOME 32 MINUTES. BOTH DEFENDANTS JARRETT AND ONTIVEROS FOUND THIS RESPONSE TIME ACCEPTABLE APPARENTLY BECAUSE NEITHER REPORTED IT TO SUPERVISING MEDICAL DEFENDANTS OR HDSP ADMINISTRATORS TURNING A BLIND EYE TO THE INDIFFERENCE TO MR. WHITE'S DETREMENT WHICH ONLY EMBOLDENED THE ABUSIVE MEDICAL NURSE DOE OFFENDERS AND MADE ONTIVEROS AND JARRETT COMPLICIT. THE RESULTING REPORT AGAIN LIKE MANY OTHERS WAS DOCTORED AND FALSIFIED TO MINIMIZE AND CONCEAL THE DEPLOABLE CONDUCTS. RATHER THAN HONESTLY REPORTING THE 32 MINUTE RESPONSE DELAY, NURSE DOES FALSELY DOCUMENTED RESPONDING IN 2 MINUTES.

44. AFTER TAKING MR. WHITE TO THE CLINIC HE CONSENTED TO A PROLACTIN BLOOD DRAW TO CONFIRM SEIZURE ACTIVITY. IT WAS DRAWN EARLY NOON/AFTERNOON SAID DATE. AGAIN DURING THESE INTERACTIONS NURSE DOES REFERENCED THE WHITE V. BEAN LITIGATION, AS A PRETEXT TO JUSTIFY REMOVING HIM FROM HIS GABAPENTIN DEFENDANT RIVAS ENTERED ADDITIONAL FALSE MEDICAL FILE ENTRIES SUGGESTING MR. WHITE WAS FAKING HIS SEIZURES DIAGNOSING MR. WHITE WITHOUT EVEN EVALUATING HIM WITH "PSUEDO SEIZURES".

45. ON FEBRUARY 05, 2022 DEFENDANT RIVAS SUMMONED MR. WHITE TO A DOCTOR VISIT. REFUSING TO DISCUSS ANY OF MR. WHITE'S MEDICAL CONCERNS DEFENDANT RIVAS UTILIZED THIS ENCOUNTER AS A PLOY AND PRETEXT IN EFFORTS TO INFLUENCE MR. WHITE TO ABANDON WHITE V. BEAN ASSURING HIM THAT IF HE DID SO "THEY" (MEDICAL DEFENDANTS) WOULD "CONSIDER" RETURNING HIM TO HIS GABAPENTIN. INFORMING MR. WHITE THAT DR. BERNALES WAS A CLOSE FRIEND AND THE MEDICAL COMMUNITY A TIGHT KNOT COMMUNITY, RIVAS ASSURED MR. WHITE IF HE DID NOT ABANDON HIS LITIGATION THAT MEDICAL DEFENDANTS WOULD CONTINUE ENGAGING IN "CREATIVE WRITTING" TO DEFEAT THE CLAIMS. DISGUSTED BY THE PROPOSITION MR. WHITE EXITED THE ENCOUNTER ADVISING DEFENDANT RIVAS THAT HE WOULD MEET HIS DEMISE RATHER THAN SUCUMB TO SAID PRESSURES.

46. AGAIN ON FEBRUARY 22, 2022 MR. WHITE SUFFERED ANOTHER SEIZURE TO WHICH A NURSE DOE RESPONDED BERATEDLY AGAIN REFERENCING WHITE V. BEAN. RESULTING REPORTS OF THIS CONTACT WERE FALSIFIED AS WELL.

47. BY FEBRUARY 01, 2022 MR. WHITE HAD BEEN COMPLETELY REMOVED FROM HIS GABAPENTIN WITHOUT ANY TAPERING AND COLD TURKEY. IN FACT FROM DEFENDANT BERNALES DECEMBER 23, 2021 ORDER THRU MR. WHITE'S FINAL ADMINISTERED DOSAGE HE WAS PROVIDED 1800 MG IN THE A.M. AND 1200 MG IN THE P.M. WHICH CREATED ADDITIONAL SUFFERINGS AND SYMPTOMS CLEARLY CAUTIONED AGAINST ON THE PILL WARNING LABEL.

48. THRU MANY CLINICAL CONTACTS MR. WHITE WOULD CONVEY TO DEFENDANT ABEL THE ATROCITIES OF MEDICAL DEFENDANTS, THEIR ARBITRARY INTERFERENCE WITH HIS SEIZURE MEDICATION GABAPENTIN AND THE ONGOING SUFFERING. HAVING THE AUTHORITY AND OPPORTUNITY TO CONTACT MEDICAL NURSE SUPERVISORS OR PRISON ADMINISTRATORS TO REPORT THE ABUSE PROTECT MR. WHITE AND PREVENT HIS SUFFERING AND TORMENT, DEFENDANT ABEL FAILED TO DO SO TURNING A BLIND EYE TO HIS ABUSES AND SUFFERINGS PERMITTING THEM TO CONTINUE AND REMAINING COMPLETE IN THEM. DEFENDANTS RIVAS AND BERNALES WENT TO SUCH EXTREMITY AND DEGREE TO DECEIVE AND FALSELY SUSTAIN THE OTHERWISE MALICIOUS DISCONTINUATION OF MR. WHITE'S GABAPENTIN THAT THEY KNOWINGLY PROVIDED PERJURIOUS AND FACTUALLY MISLEADING FALSE DECLARATIONS TO THE FEDERAL COURT IN WHITE V. BEAN IN WHICH THEY OPENLY DEFAMED AND SLANDERED MR. WHITE AND ENGAGED IN LIBEL FOR THE PUBLIC AT LARGE TO SEE. WHEN MR. WHITE WAS FORTUNATE ENOUGH TO PROMPT CUSTODY SUPERVISORS TO INQUIRE TO MEDICAL DEFENDANTS AS TO THE DISPARITY IN HIS TREATMENT, MEDICAL AND NURSE DOES JUSTIFICATIONS WOULD SUBSTANTIALLY FLUCTUATE TO PURPOSEFULLY MISLEAD THEM.

49. IN LATE OCTOBER OR NOVEMBER 2021, MR. WHITE WAS BRUTALLY ATTACKED IN WHICH HE BROKE HIS LEFT HAND, HAD ORAL INJURIES AND A LARGE STAB WOUND IN HIS BACK FROM A INMATE MANUFACTURED WEAPON. HE REPORTED SUCH TO NURSE DOES SEEKING EMERGENCY TREATMENT AND WOUND CARE AND WAS DENIED. HIS COMPLAINTS FELL ON DEAF EARS. AS A RESULT HE WAS MADE TO SUFFER FROM A BONE BREAK TO HIS LEFT HAND AND INFECTED STAB WOUND WHICH HE WAS MADE TO SELF STERILIZE AND TREAT WITH TOILET PAPER AND VASALINE.

50. ALTHOUGH ORDERED TO BE TAKEN INDEFINITELY BY COCCIE SPECIALISTS TO CONTROL HIS POTENTIALLY DEADLY COCCIE INFECTION MEDICAL DOES HAVE CONSISTENTLY INTERRUPTED HIS TREATMENT REGIMEN OF POSOCONAZOLE REFUSING TO ORDER AND PROVIDE IT TIMELY CAUSING FLUCTUATING PROGRESSES OF HIS PAINFUL INFECTION ALSO ATTRIBUTABLE TO PHARMACEUTICAL DOES AS ALLEGED IN PARAGRAPH 27, SUPRA.

51. ON MARCH 31, 2022 AS ALLEGED BY MS. DIXON IN PARAGRAPH 34, SUPRA, MR. WHITE WAS ALSO INVOLVED IN A INCIDENT AND WAS JOINTLY DETAINED WITH MS. DIXON AND SUBSEQUENTLY REFUSED IN ADMINISTRATIVE SEGREGATION. IN CONJUNCTION WITH SAID EVENTS MR. WHITE ALIKE MS. DIXON ALERTED DEFENDANTS JACKSON, LOPEZ-MAYA, STEWART, BARRETT, OBLAK, MARTINEZ AND CERTAIN DOES INCLUDING CUSTODY AND NURSE DOES OF VALIDLY PRESCRIBED MEDICATIONS AND APPARATUS CONTAINED IN HIS PROPERTY THESE DEFENDANTS POSSESSED AND HAD ACCESS TO INCLUDING HIS POSOCONAZOLE, PRESCRIPTION EYE WEAR, LEFT WRIST BRACE, ACE WRAP AND ASTHMA INHALER. HE SOUGHT THEIR RETRIEVAL AND PROVISION TO HIM TO PREVENT INTERRUPTIONS OF HIS CONTINUITY OF CARE AND WANTON SUFFERINGS PREDICTABLE TO RESULT WITHOUT THEM. HIS REQUEST WAS FURTHER TO ACCOMMODATE HIS DISABILITIES. THESE DEFENDANTS INTERRUPTED AND INTERFERED WITH HIS PRESCRIBED CARE AND FAILED TO ACCOMMODATE HIS DISABILITIES BY FAILING TO COME TO HIS AID IN RETURNING THESE MEDICAL MATERIALS OR BY CAUSING THEIR RETURN. AT THE TIME OF DRAFTING THIS COMPLAINT MR. WHITE HAS BEEN REFUSED THESE MEDICATIONS AND DEVICES FOR SOME 17 DAYS ARBITRARILY AND AS RETALIATION AND PURE PUNISHMENT.

52. MR. WHITE HAS SUBMITTED MULTIPLE MEDICAL REQUESTS TO MEDICAL DEFENDANTS TO NO AVAIL. HIS PLEAS HAVE FALLEN ON DEAF EARS. AS OF THE FILE DATE OF THIS ACTION HE HAS INCURRED TERRIFYING (AND IN 1 INSTANCE A NEAR DEADLY) ASTHMA ATTACK(S) AND SEIZURES, HAS REMAINED WITHOUT HIS LEFT WRIST SUPPORT BRACE GLASSES, ACE WRAP, COCCIE MEDICATION AND ASTHMA INHALER. HE HAS FILED A SHOREBOARD OF EMERGENCY AND REGULAR GRIEVANCES AND SIMILAR TO MS. DIXON'S RESULTS ALLEGED AT PARAGRAPH 30, SUPRA, RECEIVED THE SAME RESPONSE "NOT AN EMERGENCY PER AP 740." MOREOVER, ALTHOUGH AWARE OF HIS SEIZURE CONDITION DEFENDANTS HAVE INDIFFERENCED HIS LIFE BY FAILING TO PERMIT JOINT OCCUPANCY OF A CELL WITH A LIKE PC INMATE CAPABLE OF MEDICAL EMERGENCIES DURING SEIZURE EPISODES THAT RENDER MR. WHITE INCAPABLE FROM DOING SO HIS SELF.

1. EGG ALLERGY

53. IN EXCESS OF 26 YEARS FAR PRIOR TO HIS MARCH 29, 2019 NDOC ARRIVAL, MR. WHITE HAS REPORTED HIS EGG ALLERGY. SOMETIME IN 2019 NDOC AT HDSP REVISED ITS MEAL MENU WHICH EACH MORNING 7-DAYS WEEKLY PROVIDES INMATES EGGS FOR BREAKFAST.

54. MR. WHITE COMPLAINED TO NURSE DOES OF HIS ALLERGY AND THE DAILY EGG FEEDING ADVISING OF HIS INABILITY TO CONSUME EGGS, LOSS OF WEIGHT AND FOR HIS NEED OF A MEDICALLY ORDERED SUPPLEMENTARY DIET. NURSE DOES FALSELY DENIED THAT THERE WAS ANY ENTRY IN MR. WHITE'S MEDICAL FILE AS SUPPORTING HIS EGG ALLERGY DESPITE HIS PROVISION OF MEDICAL DEFENDANTS WITH SOME 4000 PAGES OF HIS MEDICAL HISTORY DATING BACK TO 1992 AND THE EGG ALLERGY IN DEED A PART OF HIS MEDICAL FILE CONTRARY TO NURSE DOES FALSE CONTENTION.

55. AS A RESULT OF CASE DISPOSITION WITH METRO DEFENDANTS IN WHITE V. COUNTY OF CLARK, ET AL., USDC (D. NEV.) 2:18-CV-00734 RFB VCF HE HAS REMAINED FORTUNATE ENOUGH TO PURCHASE COMMISSARY ABUNDANCE TO ENSURE HIS ADEQUATE NUTRITIONAL INTAKE ESSENTIALLY EXPENDING HIS OWN MONEY ON NUTRIENTS THE STATE BY LAW OTHERWISE HAS A INFLEXIBLE DUTY, OBLIGATION AND RESPONSIBILITY TO PROVIDE.

56. GIVEN HIS CURRENT SEGREGATION STATUS DERIVING FROM THE MARCH 31, 2022 INCIDENT, INABILITY TO ORDER COMMISSARY AND GIVEN DEFENDANTS GARCIA, SALKOFF, ASHCRAFT, JACKSON AND LOPEZ-MAYA'S SEIZURE OF HIS COMMISSARY POSSESSED IN CELL PRIOR TO HIS SEGREGATION PLACEMENT AND ITS CONTINUED RETENTION AND WHICH SINCE HAS NOT BEEN PROVIDED, HALF OF MR. WHITE'S DAILY CALORIE INTAKE AND NUTRIENTS, DUE TO HIS EGG ALLERGY, HAVE BEEN PROVIDED SINCE MARCH 31, 2022 DUE TO MEDICAL DEFENDANTS REFUSAL TO SUPPLEMENT SAID MEAL IN TURN CONSTITUTING CORPORAL PUNISHMENT AND DELIBERATE INDIFFERENCE.

2. WHITE'S DENTAL

57. MID TO LATE 2021 MR. WHITE BEGAN REPORTING A RAPIDLY PROGRESSING, SIGNIFICANTLY PAINFUL AND SPREADING INFECTION IN HIS FRONT TOOTH SEEKING EMERGENCY DENTAL ATTENTION. DENTAL DOES IGNORED THE URGENCY OF THE REQUESTS PERMITTING THE AGGRESSIVE SPREAD OF THE ABSCESS FOR MONTHS PROMPTING HIM INTO BARBARIC MACABRE OF SELF EXTRACTING THE TOOTH TO PREVENT ITS INFECTIOUS SPREAD TO HIS BRAIN. SOME SUBSTANTIAL AMOUNT OF TIME LATER DENTAL DOES SUMMONED MR. WHITE PURPORTEDLY TO ADDRESS THE DENTAL CONCERN ONLY TO DISCOVER HIS SELF EXTRACTION OF THE TOOTH. DOE DENTAL DEFENDANTS PROVIDED MR. WHITE A X RAY AND COMMENDED HIM FOR SUCCESSFULLY EXTRACTING THE ENTIRE TOOTH INCLUDING ROOTS ESSENTIALLY DOING THEIR JOB FOR THEM. MR. WHITE RETAINED THE ENTIRE TOOTH AS EVIDENCE UNTIL THIS EVIDENCE WAS SPOILIATED AND DESTROYED BY CUSTODY DEFENDANTS AS ALLEGED IN PARAGRAPH 97, INFRA.

58. FOLLOWING THE DISCONTINUATION OF MR. WHITE'S SEIZURE MEDICATION GABAPENTIN ON JANUARY 31, 2022 THRU THE CURRENT DATE HE HAS CONSISTENTLY SUFFERED FROM MULTIPLE SEIZURES WHICH HAS KNOCKED OUT 2 TEETH FILLINGS PAINFULLY EXPOSING TOOTH NERVES. HE RELENTLESSLY TO DATE COMPLAINED OF THE TREMENDOUS PAINS AND INABILITY TO PROPERLY EAT, DRINK OR SLEEP AND SOUGHT EMERGENCY DENTAL CARE TO MEDICAL AND DENTAL DOES TO NO AVAIL. HIS CONCERNS AS OF THE CURRENT DATE HAVE REMAINED IGNORED AND HIS UNBEARABLY PAINFUL DENTAL CONDITION UNATTENDED TO. MR. WHITE RETAINED THE ACTUAL DISLODGED TOOTH FILLINGS AS EVIDENCE UNTIL THIS EVIDENCE TOO WAS SPOILIATED AND DESTROYED BY CUSTODY DEFENDANTS AS ALLEGED IN PARAGRAPH 97, INFRA.

3. PSYCHIATRIC MEDICATIONS

59. IN EXCESS OF 30+ YEARS MR. WHITE HAS BEEN DIAGNOSED WITH AND SUFFERING FROM AMONGST OTHER MENTAL HEALTH AILMENTS AND DISABILITIES PARANOID SCHIZOPHRENIA, GRAVE DEPRESSION, PTSD, SUICIDE IDEATION, HALLUCINATIONS AND OTHER PSYCHOTIC DISORDERS IRREFUTABLY CATEGORIZED AS "SERIOUS MENTAL ILLNESS" UNDER DEFENDANTS AR/OP 707, SOME REQUIRING HOSPITALIZATION IN MENTAL HEALTH FACILITIES.

60. DURING THIS SAME INTERVAL MR. WHITE HAS SUCCESSFULLY CONTROLLED AND MANAGED ERRATIC PSYCHOTIC IMPULSES, BEHAVIORS AND OUTBURSTS WITH A CATALOG OF EXTREMELY POWERFUL ANTI-PSYCHOTIC DRUGS INCLUDING THORAZINE, MILETIL, SENAQUAN, SEROQUILL, ZOLOFT, PROZAC, LITHIUM, ELAVIL, VISTERIL, ARATANE, PROLIXYN, WELLBUTRIN, HALDOL, COBENTIN, EFFEXOR, ATIVAN AND WAS IN SOME INSTANCES UNDER FORCED MEDICATION BY COURT ORDER TO ENSURE HIS AND THE SAFETY OF OTHERS.

61. LEADING UP TO THE CURRENT DATE MR. WHITE HAS REMAINED PRESCRIBED AT RATHER STRONG DOSAGES THE EXTREMELY POWERFUL ANTI-PSYCHOTIC HALDOL AT 15 MG AM AND 10 MG PM, COBENTIN AND ZOLOFT. ADHERING TO THEIR EMBEDDED, ACCEPTABLE AND NON-DISCOURAGED PRACTICES AT HDSP, MEDICAL DEFENDANTS AWAIT FOR A PATIENTS PHARMACY PILL BOTTLE TO COMPLETELY DEplete PRIOR TO REORDERING A REFILL WHICH IN TURN INTERRUPTS THE PATIENTS MEDICATION CONTINUITY WITH COMPLETE INDIFFERENCE, IN MANY INSTANCES AND DUE TO PHARMACEUTICAL DOES COMPLICITIES AS ALLEGED IN PARAGRAPH 27, SUPRA, IT TAKES 14-21 DAYS TO REFILL A PATIENTS MEDICATIONS DESPITE HAVING STANDING PRESCRIPTIONS AND EFFECTIVELY INTERFERING WITH A PATIENTS MENTAL OR MEDICAL STABILITY AND CAUSING CONCERNING DECOMPENSATION.

62. SHORTLY PRIOR TO MARCH 31, 2022 AND THRU APRIL 11, 2022 MR. WHITE HAD REMAINED UNACCEPTABLY UNMEDICATED WITH HIS MUCH NEEDED ANTI-PSYCHOTIC MEDICATION HALDOL AND COBENTIN. THE ABSENCE OF HIS MEDICATIONS IN THE DAYS LEADING UP TO MARCH 31, 2022 CONTRIBUTED SUBSTANTIALLY TO HIS ERRATIC PSYCHOTIC BEHAVIOR AND THE MANNER IN WHICH HE PERCEIVED AND REACTED TO A THREAT WHICH WAS ONLY COMPOUNDED BY THE INSTIGATING AND INCITING OFFICERS IDENTIFIED IN SECTION (C) OF FACTS, IN FRA.

63. PRIOR TO MARCH 31, 2022 MR. WHITE MET WITH AND PLED WITH DEFENDANT ABEL TO CORRECT SAID CONCERNING ISSUE AND ENSURE ADEQUATE MEDICATIONS AT THE TIMES AND DOSAGES PRESCRIBED, WHILE ALTHOUGH SHE VOWED TO CORRECT THE ERROR SHE FAILED TO DO SO. THE SAME RESULTS FOLLOWED HIS MARCH 31, 2022 ADMINISTRATIVE SEGREGATION PLACEMENT WHEN ON APRIL 07, 2022 HE APPEALED TO DEFENDANT CONNOR FOR ASSISTANCE AND WAS BERATED. THE FOLLOWING DAY HE GRIEVED ON EMERGENT BASIS ONLY TO BE PROVIDED A COMPLETELY NON-RESPONSIVE AND INSENSITIVE REPLY TO HIS CONCERNS BY NURSE DOE 1.

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64. WHILE MR. WHITE CONTINUED TO DECOMPENSATE SUFFERING MENTAL ANGUISH, FEAR, ANXIETY, DEPRESSION, PARANOIA AND ENDURE PSYCHOLOGICAL TORMENT AND TORTURE FROM VOICES AND VISIONS, MEDICAL, NURSE DOES AND DEFENDANTS ABEL AND CONNOR DEMONSTRATED TO BE COMPLETELY INSENSITIVE AND CALLOUSLY INDIFFERENCE TO SUCH DESPITE MR. WHITE'S NUMEROUS NOTED SUICIDE ATTEMPTS.

C. FAILURE TO PROTECT, CELL SEARCHES AND OTHER CONDITIONS

65. MR. WHITE ARRIVED TO HDSP FROM ESP FOR FEDERAL COURT IN WHITE V. COUNTY OF CLARK ET. AL., IN NOVEMBER 2019 AND ON OR ABOUT DECEMBER 17, 2019 WAS HOUSED IN UNIT 11 F-POD WHERE HE REMAINED HOUSED THRU MARCH 31, 2022. TYPICALLY, INMATES HOUSED IN PROTECTIVE CUSTODY, WHICH IS DESIGNATED AS UNITS 9 THRU 12 AT HDSP, HAVE BEEN PLACED FOR PROTECTION DUE TO SENSITIVE CASE FACTORS SUCH AS CHILD SEX CRIMES OR OTHER DEVIANT SEXUAL OFFENSES OR FOR "SNITCHING" ON FELLOW INMATES IN THE PRISON'S GENERAL POPULATION AND WHO WISH TO DO THEM HARM. MR. WHITE'S PLACEMENT FITTED NEITHER CATEGORY. IN FACT, HE SOLELY OPTED FOR PC HOUSING TO AVOID PRISON POLITICS, FOCUS ON HIS CRIMINAL APPEALS, EXPAND HIS PROGRAMMING OPTIONS AND INCREASE HIS CHANCES OF SUCCESS IN OBTAINING PAROLE.

66. OVER THE COURSE OF HIS RESIDENCY IN F-POD, MR. WHITE WITNESSED FIRSTHAND THE EMERGENCE AND CULTIVATION OF A CULTURE AND ENVIRONMENT, NAMELY: A SNITCH-REWARD SYSTEM, IN WHICH FELLOW PRISONERS WOULD PROVIDE SNITCH INFORMATION WHETHER TRUE OR EXAGGERATED, WHICH WAS ROUTINELY RECEIVED WITH BLANKET ACCEPTANCE BY STAFF AND MORE PARTICULARLY DEFENDANTS OUTVEROS, BARRETT, JARRETT, ASHCRAFT, LOPEZ-MAYA, TORRES WILLIAMS, SALKOFF, SANCHEZ, OBLAK, MARTINEZ AND OTHER DOES. THESE DEFENDANTS WOULD IN TURN AWARD THE SNITCH INMATE HIGHER CREDIBILITY, PREFERENTIAL TREATMENT AND STAFF PROTECTION OVER OTHER PRISONERS GIVING THE SNITCH ELITE CLASS A FALSE NOTION AND SENSE OF HAVING CONTROL, STATUS AND POWER OVER THE TYPICAL INMATE.

67. PRIOR TO MS. DIXON'S NOVEMBER 2021 ARRIVAL TO UNIT 11 CELL F4, DEFENDANTS PRACTICE EXPANDED INTO A BROADER SCHEME IN WHICH DEFENDANTS OUTVEROS, BARRETT, JARRETT, ASHCRAFT, LOPEZ-MAYA, TORRES, WILLIAMS, SALKOFF, SANCHEZ, OBLAK, MARTINEZ AND OTHER DOES WOULD HAND-PICK THEIR INMATE WORKERS ARMING THEM WITH THE ESSENTIAL INFORMATION GATHERING TOOL MOBILITY AMONGST OTHERS TO OBTAIN INFORMATION.

68. ADVANCING THIS FOSTERED CULTURE DEFENDANTS HIRED MICHAEL "JOJO" DOMINGUEZ, DEANDRE "DRE" HARRIS, DEVONTE "DEE/DEON" JAMES, CHRIS BECK, KERRY "SHUG" JOHNSON, JEFFREY "LV" LEE, JEREMY "TEX" BRYSON, RAYMOND "RAY" FERNANDEZ AND KENNETH "KEN" DIVENS AMONGST OTHERS. MANY OF THESE REPUTED RATS LEARNED TO MANIPULATE DEFENDANTS DEPENDENCY ON THEIR INFORMATIONS TO THEIR ADVANTAGE. ACUSTOMED TO PLACING THEIR LIFE-LINE OF INFORMATION GATHERING ON THE BACKS OF THESE AND OTHER SNITCH INMATES, DEFENDANTS HEAVILY RELIED ON THESE INDIVIDUALS AND WERE LESS LIKELY TO DISCIPLINE OR DISPOSE OF THEM OUT OF FEAR OF INFORMATION SHUT OUT AND PERSPECTIVE OF THE MOST EGGRESSIONS OF OFFENSES COMMITTED.

69. TO ENSURE THE CONTINUITY OF INFORMATION GATHERING, DEFENDANTS INSULATED THESE INMATES FROM ACCOUNTABILITY FOR THEIR ACTS BREEDING AND FOSTERING A CULTURE AND CLIMATE OF IMPUNITY TO THE DETRIMENT OF AND AT THE SAFETY AND EXPENSE OF MANY OTHER ADVERSELY AFFECTED INMATES SUBJECT TO SCHEMATICS INCLUDING PLAINTIFFS. THE COTERIE OF HAND-PIKED ELITES ALSO LEARNED TO UTILIZE THIS WIELDED POWER TO AVENGE ADVERSARY INMATES THEY DESPISED, FEARED, DISLIKED OR FOR WHATEVER REASON ENVIED INCLUDING BOTH PLAINTIFFS. TO THIS END THEY WOULD CONCOCT FALSE INFORMATIONS PRESENTING IT TO DEFENDANTS AS RELIABLE TO MANIPULATE FAVORITISM, BENEFITS, REWARDS OR THE GRATIFICATION OF HAVING AN ADVERSARY INMATES BELONGINGS AND CELL DEDECORATED.

70. PRIOR TO AND CONTEMPORANEOUS WITH MS. DIXON'S II F4 RESIDENCY, MANY OF THESE SNITCH INMATES WERE DISCOVERED TO BE PARTAKING IN DEVIANT PREDATORY SEXUAL ACTS WITH OTHERS AND UNDER SHIELD OF SNITCH IMMUNITY UTILIZING THEIR WORKER MOBILITY CARD WITH IMPUNITY. NAMELY, INMATE JEREMY BRYSON WHILE DEFENDANTS WORKER WAS DISCOVERED IN TRANSGENDER MIAMOR BANKS CELL OVERNITE ENGAGED IN SEXUAL ACTS. HE WAS FIRED THEN REHIRED. MICHAEL DOMINGUEZ WAS DISCOVERED IN AN AFFAIR WITH TRANSGENDER MONICA SALAZAR ENTERING JANITORIAL CLOSETS FOR SEXUAL AFFAIRS AND GROOMING. HE WAS FIRED AND REHIRED. DEANDRE HARRIS WAS DISCOVERED PIMPING TRANSGENDER MIAMOR BANKS AND SELLING SPICE. HE WAS FIRED AND REHIRED ONLY TO GET DISCOVERED IN TRANSGENDER MARIAH ACOSTA'S CELL ENGAGED IN SEX ACTS AND WAS AGAIN FIRED AND REHIRED. INMATE DEVONTE JAMES WAS CONSISTENTLY REPORTED TO BE USING HIS STATUS FOR SEXUAL ENCOUNTERS WITH TRANSGENDER TARA PHONE. AWARE OF SUCH DEFENDANTS BARRETT, ONTIVEROS, SANCHEZ, ASHCRAFT AND OTHERS TURNED A BLIND EYE TAKING NO ACTION.

71. THE ATMOSPHERE OF SEXUAL ABUSE BECAME THE NORM AND ACCEPTABLE AMONGST DEFENDANTS AND VICTIMIZED INMATES WERE RELUCTANT REPORTING IT OUT OF FEAR OF STAFF AND INMATE REPRISALS AND COVER UPS TO CONCEAL IT WHICH SPARED DEFENDANTS THE EMBARRASSMENT AND EXPOSURE AND INTIMIDATED VICTIMS INTO VIOLENCE. FOLLOWING HIS UNIT 11 FIRING, INMATE DOMINEVEZ RELOCATED TO UNIT 10. THERE, DEFENDANTS ASHCRAFT, BARRETT, SANCHEZ AND CNTIVEROS REHIRED HIM ON THE PATENT CREW. KNOWLEDGEABLE TO DEFENDANTS BARRETT, CNTIVEROS, ASHCRAFT, JOHNSON, SANCHEZ, BEAN, PICCININI, LOPEZ-MAYA AND OTHERS DOES WAS THE FACT THAT INMATE DOMINEVEZ WAS ACTIVELY SOLICITING AND ATTEMPTING TO ORCHASTRATE THE UNPROVOKED ASSAULT ON MR. WHITE.

72. A COMMUNICATION PENNED BY INMATE DOMINEVEZ DIRECTED TO INMATES RUBEN LOPEZ AND DOUGLAS GOMEZ WHICH WAS INTERCEPTED AND BROUGHT TO THE ATTENTION OF THE FEDERAL COURT, NEVADA ATTORNEY GENERAL AND DEFENDANTS BARRETT, CNTIVEROS, ASHCRAFT, JOHNSON, BEAN, PICCININI, LOPEZ-MAYA AND OTHERS ALLUDED TO WEAPON POSSESSIONS BY THESE INMATES AND OFFERED FELONY CONTRABAND AS A BOUNTY FOR MR. WHITE'S ATTACK. AWARE OF DOMINEVEZ'S INCITATION AND EFFORTS IN PERMENTING UNREST AGAINST MR. WHITE DEFENDANTS TURNED A BLIND EYE TO THE OBVIOUS THREAT TO INSULATE THEIR RAT DESPITE THE EGGKREBUSNESS OF HIS MAJOR RULE CLASS B VIOLATION UNDER AR 704 AND NEVER INVESTIGATED OR ACTED ON THE PENNED COMMUNICATON TO LOCATE WEAPONS. DESPITE THIS KNOWLEDGE DEFENDANTS TORRESS, ASHCRAFT AND LOPEZ-MAYA STILL PERMITTED DOMINEVEZ TO ENTER MR. WHITE'S UNIT AND IN THEIR PRESENCE CONTINUE TO INCITE UNREST AND DIRECTLY THREATEN MR. WHITE SERIOUS BODILY INJURY.

73. INMATE DOMINEVEZ SUCCESSFULLY PURSUED HIS CAMPAIGN OF SOLICITING MR. WHITE'S ATTACK IN OCTOBER/NOVEMBER 2021 WHEN ONE OF HIS ASSOCIATES ENTERED MR. WHITE'S ASSIGNED CELL ATTACKING AND STABBING HIM WITH A INMATE MANUFACTURED WEAPON. DEFENDANTS TORRES, WILLIAMS AND LOPEZ-MAYA OBSERVING AND ALERTED TO THE ATTACK, FAILED TO INVESTIGATE OR TAKE ANY ACTION AND RATHER COVERED IT UP. FOLLOWING THE FIRST ASSAULT AGAINST MR. WHITE THREATS OF ASSAULT STILL CIRCULATED AGAINST HIM THAT CONTINUED TO BE THE PRODUCT OF INMATE DOMINEVEZ'S INCITEMENTS AND OBVIOUSLY ORDAINED BY DEFENDANTS.

74. OVER A MONTH AFTER MR. WHITE'S ATTACK AND STABBING, MS. DIXON ARRIVED TO UNIT 11 F-POD. AGAINST HER BACKGROUND OF BEING SEXUALLY ASSAULTED BY A CORRECTIONS OFFICER AT MNCC AND LEARNING OF THE PREDATORY NATURE OF VARIOUS F-POD INMATES FROM MR. WHITE FOR WHOM SHE KNEW FOR OVER A DECADE, SHE REMAINED HYPER-VIGILANT, OBSERVANT AND LARGELY ISOLATED HERSELF REMAINING HOSTILY UNAPPROACHABLE BY ANY EXCEPT THOSE SHE EMBRACED IN HER CLOSE INNER CIRCLE INCLUDING MR. WHITE AND CHRISTIAN JARO. INMATES BANTERED ON HER RUMORED EXTENSIVE VIOLENT HISTORY WHICH INCLUDED MULTIPLE INSTITUTION MURDERS, ATTEMPTS AND STABBINGS ACROSS STATE LINES, STAFF ASSAULTS, BATTERIES AND RIOTING. CIRCULATING THIS KNOWLEDGE CAUSED VARIOUS INMATES TO FEAR HER AND AVOID DIRECT CONFRONTATION INCLUDING DEFENDANTS JARRETT, BARRETT, WILLIAMS, AND LOPEZ-MAYA AMONGST OTHERS.

75. INTIMIDATED BY HER PRESENCE AND LACK OF PATIENCE OR TOLERANCE FOR THE SHINAWIGANS, OTHER INMATES FREQUENTLY IMPLICATED HER AS BEING INVOLVED IN SITUATIONS TO MANIPULATE DEFENDANTS SANCHEZ, JARRETT, ONTIVEROS, BARRETT AND ASHCRAFT TO REHOUSE HER AWAY FROM THEM ALTHOUGH SHE HAD NO PERSONAL INVOLVEMENT IN ANYTHING. IN EFFORTS TO APPEAR SENSITIVE TO HER HOUSING CONCERNS AND APPEASE HER AGAINST A BLANKET POLICY OF NOT MAKING ACCOMMODATION CONVENIENCE MOVES, DEFENDANT BARRETT MOVED TRANS-GENDER PRISONER TARA PHONE INTO MS. DIXON'S QUARTERS. LEARNING OF MS. PHONE'S UNIT HISTORY WITH INMATE JAMES FROM MR. WHITE AND OTHERS, MS. DIXON STERNLY ADMONISHED MS. PHONE AGAINST ALLOWING ANY INMATE ENTRANCE INTO THE CELL FOR ANY REASON ESPECIALLY SEX ESCAPADES AND ENCOUNTERS. SHE FURTHER CAUTIONED MR. JAMES AGAINST DISRESPECTING HER CELL AND NOT ENTER HER CELL UNDER ANY CIRCUMSTANCES.

76. AGAINST MR. DIXON'S EXPRESSED WISHES AND WITH APPROVAL OF DEFENDANT TORRESS ON AND ABOUT NOVEMBER 25, 2021 MR. JAMES AND MS. PHONE DID SO ANYWAY. FURTHER, MS. DIXON IMMEDIATELY ALERTED DEFENDANTS BARRETT AND JARRETT OF THE PREA INSTANCE INVOLVING THEIR WORKER AND DEMANDED MS. PHONE'S REMOVAL FROM HER CELL. AS A ALTERNATIVE GIVEN HER AND MR. WHITE'S CALIFORNIA HISTORY, THEIR MEDICAL AILMENTS, ABILITY TO MONITOR EACH OTHER AND GIVEN HIS LEGAL EDUCATION, MS. DIXON SOUGHT HIM AS A CELL MATE. SHE WAS REBUFFED UNTIL IN-CELL TENSIONS ESCALATED TO THE THRESHOLD OF THREATS AND ONLY THEN DID DEFENDANTS BARRETT AND JARRETT REMOVE MS. PHONE REPLACING HER WITH MR. WHITE.

77. MEANWHILE, DEFENDANTS JARRETT, BARRETT AND CONTIVEROS EMPLOYED KERRY "SHUG" JOHNSON (A REPUTED SEX PREDATOR AND CLANDESTINE RAT) AS A WORKER IN F-POD WHO, PRIOR TO MR. WHITE'S MOVE WITH MS. DIXON, IMMEDIATELY BEGAN PREYING ON AND LYING TO MR. WHITE'S CELLY CHRISTIAN JARO A 135 POUND, WHITE 19 YEAR OLD FIRST-TIMER, GUILTY, SCARED, NAIVE AND WEAK APPEARING KID WHO PRESENTED AS EASY PREY FOR MR. JOHNSON A HOSTILE 5'11 - 6 FOOT 210 POUND BLACK INTIMIDATING MALE TO MR. JARO. FEARFUL AND ON PROMISES OF PROTECTION, GIFTS, COMMISSARY ITEMS AND PACKAGES, MR. JARO ENABLED THE SEXUAL EXPLOITATION AND ABUSES UNKNOWN TO MR. WHITE. AWARE OF THE ONGOING SEXUAL EXPLOITATION AND ABUSE OF THIS KID BY THEIR WORKER MR. JOHNSON, DEFENDANTS BARRETT, JARRETT, CONTIVEROS, SANCHEZ AND ASHCRAFT CONDONED IT FAILING TO COME TO MR. JARO'S AID DESPITE REPORTS BY VARIOUS INMATES OF THE SEXUAL ABUSES. WHEN MR. WHITE DISCOVERED THE SITUATION HE ENCOURAGED MR. JARO TO TERMINATE ANY FURTHER DEALINGS WITH MR. JOHNSON AND PLEDGE HIS AND MS. DIXON'S SUPPORT AND PROTECTION FROM FURTHER ABUSE.

78. RESENTING MR. JARO'S RETRACTION, SOMETIME IN DECEMBER 2021 DURING THEIR ACTIVITIES WHILE MR. JARO SLEPT USING WORKER MOBILITY AND PRIVILEGE MR. JOHNSON ENTERED MR. JARO'S CELL SECURING HIMSELF IN WHILE THE INNOCENT KID SLEPT BEFORE STRANGLING, CHOKING BITING, DIGITALLY PENETRATING AND MASTERBATING ON MR. JARO WHILE PULLING HIS HAIR. TRAUMATIZED FROM THESE EVENTS, MR. JARO FEARFUL OF RETALIATION FROM DEFENDANTS BARRETT, JARRETT, CONTIVEROS, SANCHEZ, ASHCRAFT AND MR. JOHNSON, REFUSED TO REPORT THE EVENT REMAINING SILENT AND LIVING IN TERROR. OPENLY BOASTING TO HIS ASSIGNED CELLY OF THE RAPE EVENT TO "TEACH HIM (JARO) A LESSON", MR. JOHNSON'S CELLY ALSO A WORKER REPORTED THE EVENTS TO DEFENDANTS JARRETT AND BARRETT WHO TURNED A BLIND EYE FAILING TO ACT. RATHER, THEY SIMPLY REHUSED MR. JOHNSON IN 11 C 14 AS A WORKER COVERING UP THE SEXUAL ASSAULT REFUSING TO ACT SO AS NOT TO LOSE A VALUABLE SOURCE OF THEIR RAT INFORMATION.

79. EVENTUALLY MR. WHITE DISCOVERED THE EVENT AND BECAME INFURIATED SHARING THE EVENT WITH MS. DIXON WHO AS A SEXUAL ASSAULT VICTIM HERSELF RELATED AND WAS BOTH ANGERED AND DISGUSTED AT THE REVELATIONS. BOTH PLAINTIFFS ENCOURAGED THE KID TO REPORT THE INCIDENT TO DEFENDANT JARRETT AND ACCOMPANIED HIM TO OBSERVE JARRETT AGAIN ATTEMPT TO COVER IT UP AND PROTECT HIS PRIZED RAT

MR. JOHNSON.

80. OBSERVING THE PROFOUND DISGUST AND ANGER OF PLAINTIFFS WHO BOTH ACCOMPANIED MR. JARO FOR THE REPORT, DEFENDANT JARRETT CONTACTED DEFENDANTS ONTIVEROS AND BARRETT WHO INITIATED PREA PROTOCOL AND MOVED MR. JOHNSON NOT BECAUSE OF THE EGREGIOUSNESS OF THE PREDATORY SENSELESS VICTIMIZATION CAUSED TO MR. JARO BUT BECAUSE THESE DEFENDANTS FEARED PLAINTIFFS WOULD RETALIATE AGAINST THEIR PRIZED RAT. FOLLOWING THE KIDS TRAUMATIC EVENT PLAINTIFFS EMBRACED THE KID AS THEIR OWN PROVIDING HIM PROTECTION GIVEN DEFENDANTS UNWILLINGNESS TO DO SO AND ALERTING OTHERS TO STEER CLEAR. PLAINTIFFS EXPOSURE OF DEFENDANTS ONTIVEROS, JARRETT AND BARRETT'S COVER UP ATTEMPTS AND INSISTENCE THAT THEY PROPERLY ACT ON THIS PREA INSTANCE SET THE STAGE AND CREATED ANOTHER IMPETUS OF DEFENDANTS TO RETALIATE.

81. BASED ON COINED AND PURELY EXAGGERATED REPORTS OF A NEW EMERGING RAT - CHRIS BECK, PLAINTIFFS CELL WAS SCHREWD BY DEFENDANTS SALKOFF, WILLIAM, SANCHEZ AMONG OTHERS AT THE REQUEST OF DEFENDANT ONTIVEROS IN SEARCH OF WEAPONS PURPORTEDLY. DURING THIS SEARCH SHE POSSESSED MEDICAL CRUTCHES RECEIVED BY HER FROM MEDICAL WHICH REMAINED FULLY IN FACT BUT UNDOCUMENTED. MR. BECK, WHO PREVIOUSLY THE NEXT DOOR NEIGHBOR OF PLAINTIFFS IN 11 F 3 WAS HOMO-PHOBIC, RACIST DESPISED BLACKS AND WAS INTIMIDATED BY BOTH HIS RATHER LARGE CELLMATE INMATE DAMIEN SMITH AND BOTH PLAINTIFFS. DISCOVERING THE SMITH ROUTE TO ASCEND TO POWER AS A UNIT WORKER AND BENEFIT FROM A BETTER HOUSING SITUATION, OUT OF DESPERATION, HE PROVIDED DEFENDANTS FALSE INFORMATION THAT PLAINTIFFS WERE CUTTING THEIR CELL DESK CONSTRUCTING A WEAPON WHILE SIMULTANEOUSLY ADVISING DEFENDANTS ONTIVEROS, BARRETT, JARRETT, SANCHEZ AND OTHERS OF HIS ULTIMATE MOTIVE TO BE LYING INDICATING IN-CELL ANXIOSITY BETWEEN HIM AND MR. SMITH AND THE FACT THAT HE HAD BAD BLOOD WITH PLAINTIFFS DUE TO LOUD PLAYING OF MUSIC.

82. AT HDSP, A MEDIUM-MAXIMUM FACILITY, IT IS NOT UNCOMMON FOR CELLS TO BE MISSED STRIPS OF DESK STEEL CUT BY PREVIOUS OCCUPANTS OF A CELL USED TO MAKE WEAPONS. IN FACT, EACH CELL ASSIGNED BOTH PLAINTIFFS HAD EVIDENCE OF SOME HISTORY OF DESK CUTTING (EG, 11-E-9; 11-F-27; 11-F-8; 11-F-4; 4-C-12; 6-B-40, ETC.). MOREOVER, MR. WHITES CURRENT CELL AT THE TIME OF DRAFTING THIS COMPLAINT HAS SEVERAL MISSING DESK STRIPS FROM PREVIOUS OCCUPANTS MAKING WEAPONS.

83. DEFENDANTS HAVE IMPLEMENTED NO METHOD OF IDENTIFYING AND TRACKING THESE INSTANCES FOR THE SAKE OF PROTECTING FUTURE INNOCENT OCCUPANTS AND BY IN WHICH TO ASCERTAIN WHETHER THE CUTTING WAS BY CURRENT OR PREVIOUS OCCUPANTS. THE FALSE INFORMATION PROVIDED BY MR. BECK PROVED FALSE WHEN DEFENDANTS SALKOFF, SANCHEZ AND WILLIAMS AMONGST OTHERS DISCOVERED THE IDENTIFIED DESK LOCATIONS TO BE SUBSTANTIALLY RUSTED LACKING ANY EVIDENCE OF FRESH CUTTING. HOWEVER MR. BECK WAS NEVER PENALIZED FOR HIS FALSE REPORTS NOR DID THIS DISCOVERY STOP INHERENTLY OFFENSIVE HOMO PHOBIC COMMENTS BEING MADE AGAINST PLAINTIFFS BY DEFENDANTS WILLIAMS, SALKOFF AND SANCHEZ DUE TO THEIR OBSERVATION OF MAKE UP, PANTIES AND BRAS IN THE CELL DURING THE COURSE OF THEIR SEARCH.

84. DEFENDANTS WILLINGNESS AND DESPERATION TO ACT ON ANY INFORMATION INVOLVING PLAINTIFFS AS PRETEXTS TO EMPLOY PUNITIVE SEARCHES AND CALCULATED HARASSMENT ON THIS OCCASION CREATED YET ANOTHER DILEMMA AGAIN EXPOSED BY PLAINTIFFS TO DEFENDANTS EMBARRASSMENT AND WHICH DIRECTLY IMPACTED THE SAFETY OF PLAINTIFFS, STAFF AND OTHERS AND CONSTITUTED A EGREGIOUS BREACH TO SECURITY IN WHICH DEFENDANTS, NOT SURPRISINGLY, ATTEMPTED TO MINIMIZE, COVER UP AND CONCEAL.

85. DOORS IN HDSP UNIT 11 ARE OPERATED FROM A ELECTRONIC CONTROL PANEL IN THE UNIT TOWER. THE MAGNET ALIGNMENT OR LACK THEREOF SENDS A SIGNAL TO THE TOWER CAUSING A GREEN OR RED LED INDICATOR AS TO WHETHER A DOOR IS SECURE OR OPEN. IN THE EVENT OF A SYSTEM FAILURE OF THE TOWER COMPUTER OR EMERGENCY, THE OPTION OF MANUALLY KEYING THE DOOR OPEN CAN BE EMPLOYED BY A OFFICER WHICH BYPASSES THE UNIT TOWER CONTROL. A MANUALLY UNLOCKED DOOR MUST BE MANUALLY RELOCKED BY KEY IN ORDER TO RENDER THE TOWER LED INDICATORS RELIABLE. A MANUALLY UNLOCKED DOOR CAN STILL BE CONTROLLED BY THE TOWER BUT ALTHOUGH SHOWING LOCKED ON THE PANEL DUE TO THE ALIGNMENT OF THE MAGNETS, IN ACTUALITY AND FACT WITHOUT KEY MANUALLY RE-LOCKING THE DOOR IT IS NOT LOCKED AND CAN SIMPLY BE PULLED OPEN WITH LITTLE EFFORT.

86. IN ENTERING PLAINTIFFS CELL DEFENDANTS SALKOFF, WILLIAMS, SANCHEZ AND OTHERS MANUALLY KEYED THE DOOR OPEN PURPOSEFULLY FORGETTING TO RE-KEY IT LOCKED UPON DEPARTING. GIVEN THAT THE DOOR MAGNETS ALIGNED, THE TOWER REMAINED UNDER FALSE IMPRESSION THAT SAID DOOR WAS SECURED FOLLOWING THE EVENING SEARCH AND FOR 17 HOURS. THE FOLLOWING MORNING AT 11:00 A.M., REALIZING HER DOOR WAS UNSECURED THROUGHOUT THE NIGHT AND EARLY MORNING HOURS, SHE CONFRONTED THE UNIT TOWER OFFICER MOKA SEEKING THAT HE DOCUMENT THE EVENT FOR FUTURE REFERENCE.

87. THE FLAGRANT LAPSE IN SECURITY WHICH WAS DELIBERATE COULD HAVE PROVOKED VARIOUS SCENARIOS AS IT INVOLVED 2 LGBTQ MAX CUSTODY PRISONERS WITH VIOLENT HISTORIES, SENTENCED TO LIFE SENTENCES AT NITE IN A UNSECURED CELL ALONE WITH AN UNWARY LONE WITMAN. ANY SCENARIO FROM A KIDNAP/HOSTAGE SITUATION, ATTEMPTED ESCAPE TO WORSE ASSAULT OR MURDER COULD HAVE ARISEN. MOREOVER, FOR PLAINTIFFS AND ESPECIALLY MS. DIXON WITH A HISTORY OF SEXUAL ASSAULT VICTIMIZATION, THE SCENARIO COULD HAVE RESULTED IN THEIR BRUTAL ASSAULTS WHILE THEY SLEPT BY OTHER INMATES OR WORSE A RAPE GIVEN THE PREDATORY ATMOSPHERE FOSTERED AND CREATED BY DEFENDANTS. EVEN MORE, IT POSED A DIRECT THREAT AGAINST OTHER UNIT INMATES WHO COULD HAVE EASILY BEEN ABDUCTED INTO THE CELL AND ASSAULTED OR MURDERED.

88. GIVEN THE SEVERITY OF THE BREACH BOTH PLAINTIFFS GRIEVED TO AND SIMULTANEOUSLY CAUSED FILINGS OF CHARTS REGARDING THE ISSUE TO DEFENDANTS FINLEY, JOHNSON, CONTRERAS AND BARRETT AND IT WAS COVERED UP. THE CHARTS PARTICULARLY EXPRESSED CONCERN FOR RETALIATION AND WAS FILED WITH THE NEVADA ATTORNEY GENERALS OFFICE AS WELL. DEFENDANT FINLEY COMPLICIT IN DEFENDANTS COVER UP DISMISSED THE CONCERN AS A "MAINTENANCE ISSUE."

89. OBSERVING THE LEVEL OF INDIFFERENCES, INCOMPETENCE, DISREGARD, INEPTNESS AND RECKLESSNESS AGAINST THE BACKDROP AND NOTORIOUS HISTORY OF RAPES AND ASSAULTS IN THE POD COUPLED WITH THE REPLETE INSTANCES OF STAFF COVER UPS AND DEFENDANTS INCITEMENT AND INSTIGATION OF INCIDENTS, BOTH PLAINTIFFS BEING PREVIOUSLY STABBED, SEXUALLY AND PHYSICALLY ASSAULTED AND ABUSED, ITS NO WONDER WHY INMATES WOULD FEEL THE URG AND NEED TO SELF-ARM TO PROVIDE SELF-PROTECTION WHERE DEFENDANTS HAVE RESULTANTLY DEMONSTRATED THE INABILITY TO KEEP INTERNAL ORDER AND PROVIDE THEIR PROTECTION LESS ALONE THE PROTECTION OF ONE OF THEIR OWN AN UNARMED INNOCENT UNWARY LONE WITMAN - OFFICER K. THOMAS. EVEN MORE SO AFTER THEIR WITNESSING OF YET ANOTHER CELL RAPE ORCHASTRATED BY DEFENDANTS OCCURRING JUST 2 CELLS AWAY IN 11-F-6 JUST DAYS FOLLOWING THE UNKEYED DOOR INCIDENT. UNBEKNOWN TO PLAINTIFFS AT THE TIME, SAID PERCEPTION, ANALYSIS AND PRISON TEACHINGS WOULD PROVE INVALUABLE IN THE NEAR FUTURE TO BEFALL PLAINTIFFS AS WOULD BE ORCHASTRATED AND INSTIGATED BY DEFENDANTS THEMSELVES AS RETALIATION.

90. IN LATE FEBRUARY / EARLY MARCH 2022 INMATE JOSHUA JOHNSON NDOC NO. 1251687 MOVED INTO UNIT 11 CELL F-24 FROM UNIT 10 WHICH HOUSED INMATE DOMINGUEZ AND A DOCUMENTED ENEMY OF MS. DIXON "FRANK." UNBEKNOWN TO PLAINTIFFS, JOSHUA JOHNSON WAS PAID A BOUNTY TO FACILITATE OR INITIATE A STABBING ASSAULT ON PLAINTIFFS. THIS WAS CONFIRMED SUBSEQUENTLY TUESDAY MARCH 22, 2022 WHEN MR. WHITE ENCOUNTERED BOTH DOMINGUEZ AND HIS CELLY INMATE FREEMAN WHEN THEY BERATED HIM IN PASSING ASSURING HIM "THE DUE IS PAID ST. LOUIS HAS SOMETHING FOR YOU AND SEANAH'S ASS."

91. UPON RETURNING TO HIS CELL MR. WHITE MADE MS. DIXON AWARE OF THE IMMINENT CREDIBLE THREAT INSTRUCTING HER TO REMAIN VIGILANT TO ENSURE EACH OTHERS SAFETY. IN THE AFTERNOON HOURS MARCH 30, 2022 A INMATE MAYS ARRIVES AS THE ASSIGNED CELLMATE OF JOSHUA JOHNSON AFTER A BROADCASTED CHANNEL 6 I-TEAM INVESTIGATION Aired A SPECIAL SEGMENT ON THE PREDATORY HISTORY OF MR. MAYS. WITH ABSOLUTELY NO INVOLVEMENT OF PLAINTIFFS, ALMOST INSTANTLY OTHER F-POD RESIDENTS BEGAN INFLUENCING JOSHUA JOHNSON TO EJECT MR. MAYS OUT OF THE UNIT POD AND HIS CELL. AT P.M. TIER ACTIVITIES JOHNSON APPROACHED PLAINTIFFS DOOR AT WHICH TIME THEY ADVISED HIM RESPECTFULLY TO STAY AWAY FROM THEIR DOOR ADVISING THAT SO LONG AS HE LIVED WITH MR. MAYS HE WAS NOT WELCOME AT THEIR DOOR.

92. INVESTIGATING A SCENARIO JOHNSON FALSELY CONVEYED TO MR. MAYS THAT PLAINTIFFS WERE THE SOURCE ATTEMPTING TO HAVE HIM EJECTED OUT OF THE POD CAUSING MAYS TO DIRECTLY APPROACH PLAINTIFFS CELL FOR CONFRONTATION AND ADVISING PLAINTIFFS THAT JOHNSON INFORMED HIM THAT IT WAS PLAINTIFFS. PLAINTIFFS ASSURED MR. MAYS THAT THIS WAS NOT THE CELL TO BE PICKING FIGHTS WITH "I PROMISE YOU." AFTER MR. MAYS ABANDONED PLAINTIFFS DOOR AND TALKED TO JOHNSON, INMATE JOHNSON RETURNED TO PLAINTIFFS DOOR OVERLY ANIMATED THREATENING PLAINTIFFS CONFIRMING HIS BOUNTY PAY TO ASSAULT PLAINTIFFS AND VOWING TO "BLAST" THEIR "ASSES" AND "SMASH" THEM OUT, PLAINTIFFS SIMPLY RESPONDED "SAY LESS."

93. WITH TENSIONS RISING THE FOLLOWING MORNING DESPERATE TO RELOCATE MR. MAYS BRUTALLY SMASHED A UNSUSPECTING INMATES FACE WITH A LARGE ROCK IN A CLOTH BAG, CONFINED IN THEIR CELL AT THE TIME OF THE INCIDENT PLAINTIFFS HAD ABSOLUTELY NOTHING TO DO WITH IT BUT WITH GOOD REASON SUSPECTED MR. JOHNSON HAD A WEAPON AND WOULD ATTACK THEM FIRST OPPORTUNITY.

94. DESPITE BEING CONFINED WHEN THE INCIDENT OCCURRED AND BEING ON THE COMPLETE OPPOSITE TEAM GROUP, AS USUAL SNITCHES FALSELY IMPLICATED PLAINTIFFS AS BEING INVOLVED WITH THE INCIDENT. BY DEFENDANTS ASHCRAFT AND SALKOFF'S ACCOUNTS MAYES AND JOHNSON IMPLICATED PLAINTIFFS. PRIOR TO 11:30 A.M. ON MARCH 31, 2022, DEFENDANT JARRETT CONTACTED PLAINTIFFS AT THEIR CELL ADVISING MS. DIXON TO "PULL UP" SHE'S MOVING DESPITE KNOWING HER HOUSING SENSITIVITY ISSUES AND HIGH PROPENSITY FOR VIOLENCE IF HOUSED WITH THE WRONG CELLMATE. DEFENDANT JARRETT INFORMED PLAINTIFFS "BARRETT'S TIRED OF YOUR NAMES COMING UP IN SHIT SHE'S PISSED RIGHT NOW." MS. DIXON PACKED AND REMAINED PACKED UNTIL SHORTLY AFTER 5:30 P.M.

95. SHORTLY AFTER 5:30 P.M. A COHORT OF OFFICERS ENTERED UNIT 11 F POD INCLUDING DEFENDANTS ASHCRAFT, SALKOFF, JACKSON, LOPEZ-MAYA, OBLAK, MARTINEZ AMONG OTHERS. MARCHING STRAIGHT TO PLAINTIFFS CELL THEY DEMANDED THAT PLAINTIFFS EXIT TO THE SHOWERS AND UNCLUTCH FOR A CAVITY SEARCH TO WHICH PLAINTIFFS COMPLIED. DEFENDANT ASHCRAFT ADVISED PLAINTIFFS THAT EACH TIME HE COMES TO UNIT 11 ITS INVOLVES PLAINTIFFS AND THAT HE SHOULD JUST LET OUT THE SAME PERSON THAT SNITCHED ON PLAINTIFFS IN FL4 OUT TO "FUCK YOU UP AND BE THROUGH WITH IT WITH DEFENDANT LOWERTURE CHIMING IN THAT HE'S TRYING TO SHOOT SOMEBODY. ASHCRAFT INSTRUCTED DEFENDANT LOWERTURE TO RELEASE INMATE JOHNSON FROM HIS CELL ONCE THEY LEAVE SO "THEY CAN TALK" ABOUT WHAT ASHCRAFT AND LOWERTURE AND STAFF TALKED ABOUT IN THE HALLWAY CONCLUDING "YOU NEVER KNOW YOU MAY GET A SHOT!" ASHCRAFT CONTINUED TALKING WITHIN EARSHOT OF PLAINTIFFS TO LOWERTURE IMPLICATING THE INMATES WHO ARE SNITCHING MAKING DEFENDANTS "JOBS HARDER" AND ADVISING THAT AS LONG AS ITS NOT HIS STAFF OR INMATE WORKERS HE DIDNT GIVE A SHIT WHAT YOU DO."

96. FAILING TO DETECT THAT PLAINTIFFS HAD ONE OR MORE KNIVES ON THEM THEY WERE CUFFED AFTER PURPORTED "SEARCH" AND PLACED IN UNIT A/B POD CLASSROOM WHILE THEIR CELL AND PROPERTY WAS DESECRATED. ESCORTING MS. DIXON AND IN MR. WHITES PRESENCE DEFENDANT SALKOFF BOASTED THAT HE'S ABOUT TO "FUCK YOUR CELL UP SINCE YOU GUYS WANNA COMPLAIN AND FLY EMAILS ABOUT ME, MY SERGEANT AND CO-WORKERS." SALKOFF FURTHER CHALLENGED PLAINTIFFS TO "BLINK WRONG" TO JUSTIFY HIS USE OF FORCE TO NO AVAIL AS PLAINTIFFS JUST LAUGHED.

97. AT THE BEQUEST OF DEFENDANT ONTEVERO'S PLAINTIFFS CELL AND PROPERTIES WERE DESECRATED FOR SOME 1 HOUR BY MULTIPLE OFFICERS INCLUDING DEFENDANTS SALKOFF, JACKSON, ASHCRAFT, LOPEZ-MAYA, MARTINEZ AND OBLAK AMONGST OTHERS IN A CALCULATED EFFORT TO INFLAME, INCITE, ANGER AND GET A VIOLENT RESPONSE FROM PLAINTIFFS. THE MALICIOUS, PUNITIVE, INHERENTLY DISASTEROUS SEARCH LEFT SOME 7,500-10,000 PAGES OF LEGAL DOCUMENTS COMPLETELY SHUFFLED IN SHAMBLES AND IN DISARRAY WITH ALL OF PLAINTIFFS' PROPERTIES STREWN THROUGHOUT THE CELL MIXED TOGETHER. VARIOUS ITEMS WERE TAKEN OF PERSONAL PROPERTY, EVIDENCE WAS PLANTED AND DESTROYED AND PROPERTY DESTROYED. ONE WEAPON WAS RECOVERED FROM THE CELL. VIEWING GAY PUBLICATION "BLACK AND PINK" MAGAZINES, NUDE MALE PHOTOS, MAKE UP, BRAS AND PANTIES OUT OF SPITE AND ANTI-GAY RESENTMENT, ONE OR MORE DEFENDANTS ETCHED "FAGS" "HOMOS" "FLM" AND OTHER HOMOPHOBIC EPITHETS OR ACRONYMS. FOLLOWING THE CELL SEARCH PLAINTIFFS WERE RELEASED BACK TO THEIR CELL SHORTLY PRIOR TO 6:30 P.M. ACTIVITY RELEASE FOR LOWER TIER.

98. ANGERED AT THE CATASTROPHIC AND DISRESPECTFUL RESULTS OF THE PUNITIVE SEARCH MS. DIXON CONFRONTED DEFENDANT LOUVERTURE ABOUT THE "SHIT TALKING" BETWEEN HIM AND DEFENDANT ASHCRAFT. DEFENDANT LOUVERTURE CONVEYED "TAKE CARE OF YOUR BUSINESS IN LETTING HIM (INMATE JOHNSON) OUT. MS. DIXON ADVANCED UPSTAIRS AND MR. WHITE ADVANCED NEAR THE STAIRS PREPARING TO ASSIST MS. DIXON WITH THE CONFRONTATION IN THE EVENT DEFENDANT LOUVERTURE CREATED A THREAT BY PURPOSEFULLY RELEASING INMATE JOHNSON WHICH INDEED HE DID. HEARING MR. JOHNSON'S DOOR RELEASE MR. WHITE AND MS. DIXON RESPONDED ASSUMING JOHNSON, LIKE MAYS, AS THREATENED THE PREVIOUS DAY, HAD A WEAPON.

99. THE DELIBERATE EXPOSURE OF PLAINTIFFS TO THIS CLEARLY PERCEIVED AND FORESEEABLE THREAT WAS INTENTIONAL, INCITED AND INSTIGATED BY THESE ROGUE DEFENDANTS IN EFFORTS TO CREATE JUSTIFIABLE PRETEXTS TO LETHALLY SHOOT PLAINTIFFS. DEFENDANTS PURPOSEFULLY AND FRAUDULENTLY TAMPERED WITH THE CRIME SCENE TO CONCEAL AND COVER UP THEIR CULPABILITY AND INVOLVEMENTS AFTER THE FACT PURPOSEFULLY CONTAMINATING AND PLANTING EVIDENCE TO SUPPORT THEIR NARRATIVE OF PRECIPITATING EVENTS. RESULTING REPORTS INVOLVING THE CELL SEARCH AND INSTIGATED INSTANCE OF VIOLENCE AUTHORED BY DEFENDANTS SALKOFF AND LOPEZ-MAYA WERE BOTH MALICIOUSLY, PURPOSEFULLY FALSIFIED, SANITIZED MISREPRESENTING, DISTORTING AND CREATING RELEVANT FACTS AND IDENTITIES OF ALL STAFF PARTICIPANTS.

100. DEFENDANTS CONTRERAS, SANCHEZ, ASHCRAFT, OBLAK, STEWART, MARTINEZ AND SYDIENGO AMONGST OTHERS WERE COMPLICIT IN THE FAILURE TO PROTECT AND ATTEMPTED TO COVER UP THE SEVERITY OF THE INCIDENT AS AFTER VIEWING THE RESULTING REPORTS OF DEFENDANTS LOPEZ-MAYA AND SALKOFF, RATHER THAN CAUSING THE INSERTION OF CORRECT AND TRUE FACTS, THESE DEFENDANTS ENDORSED AND APPROVED THE FALSE NARRATIVES REPORTED BY SALKOFF AND LOPEZ-MAYA APPROVING THEIR FILINGS AND ACTING COMPLICIT IN THE COVER UPS.

101. ALL OF PLAINTIFFS PROPERTIES WERE THROWN ONTO A LARGE CARTONED. CERTAIN PROPERTIES WERE TAKEN ARBITRARILY INCLUDING, BUT NOT LIMITED TO MR. WHITE'S PERSONAL WATCH, A GOLD RING, MS. DIXON'S LARGE CLEAR BOOM BOX RADIO, MAKE UP, PERSONAL LEGAL BOOKS AND MAGAZINES, MEDICAL AND LEGAL RECORDS, AND BOTH COMMISSARY AND PACKAGE ITEMS ALL LEGITIMATELY PURCHASED AND POSSESSED BY PLAINTIFFS. TO BE MALICIOUS AND VINDICTIVE AND AS VOWED DEFENDANTS LOPEZ-MAYA, ASHCRAFT, SALKOFF AND JACKSON PURPOSEFULLY STACKED 3 FULL BOXES OF LEGAL DOCUMENTS ON TOP OF MR. WHITE'S PERSONAL 113 FLAT SCREEN TELEVISION PURPOSEFULLY BUSTING ITS SCREEN. SOME OF PLAINTIFFS PERSONAL CLOTHING'S AND PHOTOGRAPHS WERE ALSO DAMAGED WITH DEFENDANTS INTENTIONAL SPILLAGE OF HYGIENIC ITEMS SUCH AS BABY OIL, VASALINE, SHAMPOO, CONDITIONER, BODY WASH, MOUTH WASH AND LOTION ONTO THEM. CONTAINED IN THEIR PROPERTIES IN ADDITION TO PERSONAL ITEMS THEY WERE DENIED WERE ALSO ESSENTIAL MEDICATIONS AND APPARATUS'S AS WELL AS LEGAL MATERIALS.

102. FINALLY PLAINTIFFS WERE PLACED INTO SEGREGATION PENDING HEARINGS ON THE GROSSLY DISTORTED DISCIPLINARY REPORTS UNDER THE MOST OF INHUMANE AND UNCIVILIZED CONDITIONS THAT WOULD ONLY COMPOUND THEIR TERROR AND DEFENDANTS AND THEIR AGENTS TREACHERY AND INSENSITIVITY. AFTER PLACING EACH OF THEM INTO SEGREGATION WITH SIMPLY THE CLOTHES ON THEIR BACKS DEFENDANTS MALICIOUSLY AND TO BE SADISTIC PAUSED THEIR MOST BASIC HUMAN, CIVIL AND CONSTITUTIONAL RIGHTS SUBJECTING THEM TO THE MOST UNCONSCIONABLE, EGREGIOUS, DISPICABLE, DEPLORABLE, OFFENSIVE AND INHUMANE CONDITIONS PURPOSEFULLY DEPRIVING THEM OF THE MOST MENIAL BASIC NECESSITIES OF LIFE.

103. IN SECREATION AND SINCE SAID PLACMENT THRU THE FILE DATE OF THIS ACTION THEIR PROVISION OF ADEQUATE FOOD AND NUTRITION HAS BEEN SUBSTANTIALLY DIMINISHED THEIR LIFE-SUSTAINING MEDICAL CARE INTERFERED WITH AND FLAT OUT DENIED AND COMPLETE DISREGARD GIVEN TO THEIR RELIGIOUS AND COURT ACCESS RIGHTS. PLACED INTO SECREATION WITH JUST THE CLOTHES ON THEIR BACKS THEY HAVE BEEN RENDERED INCAPABLE NOW FOR 13 CONSECUTIVE DAYS TO PROPERLY BATH, GROOM AND HAVE REMAINED LANQUISHING IN THE SAME SOILED UNDER GARMENTS ABSENT ANY CHANGE OR ABILITY TO WASH THEM. NOR HAVE THEY BEEN PERMITTED TO ACCESS BASIC AND ROUTINELY USED HYGIENIC ITEMS SUCH AS SHAMPOO, BODY WASH, CONDITIONER, LOTION, DEODORANT, ETC. BEING PROVIDED 1 SINGLE-STATE WOOL BLANKET AND 2 SHEETS DESPITE POSSESSING THEIR OWN IN PROPERTY, THEY HAVE BEEN DENIED FRESH LINEN.

104. MR. WHITE'S ASTHMATIC CONDITION AND INABILITY TO UTILIZE WOOL PRODUCTS DUE TO HIS ASTHMA ONLY COMPOUNDS HIS SUFFERING GIVEN THE FROGID TEMPERATURES AND INABILITY TO ACCESS HIS PERSONAL NON-WOOL BEDDINGS. GIVEN PLAINTIFFS ALREADY DIMINISHED NUTRIENTS THEIR COMPROMISE TO HAVE TO NEGOTIATE THEIR DAILY NUTRIENTS FOR THE SIMPLEST OF BASIC ITEMS LIKE PEN AND PAPER FURTHER AGGRAVATE THE DIRE SITUATION. THESE DEPLORABLY HARSH CONDITIONS AND DEFENDANTS COMPLETE DISREGARD TO PLAINTIFFS SUFFERINGS BEING PURPOSEFULLY INFLICTED ARE OUT OF SPITE AND RESENTMENT AND TO INTENTIONALLY PUNISH PLAINTIFFS HARSHEN THEIR LIVING CONDITIONS, DIMINISH AND CHIP AWAY AT THEIR CIVILITY, INTEGRITY, DIGNITY, SELF RESPECT, PSYCHOLOGICAL HEALTH AND SANITY, HUMANITY, SELF WORTH AND SENSE OF INDEPENDENCE. RENDERING THEM FULLY INCAPABLE OF EVEN SELF DEPENDANCE DEFENDANTS ARE PURPOSEFULLY DEHUMANIZING, BELITTLE AND EMBARRASSING PLAINTIFFS WITH SHEER HUMILIATION.

105. ON APRIL 04, 2022 PLAINTIFFS WERE SUMMONED TO IDENTIFY AND SEPARATE THEIR PROPERTIES DISCOVERING NUMEROUS DAMAGED AND MISSING PROPERTIES. THEY EACH SOUGHT THEIR MEDICATIONS AND MEDICAL APPARATUS AND WERE DENIED UNTIL SUCH TIME AS DEFENDANT GARCIA ORDAINED THE RELEASE OF THEIR PROPERTIES. TO DATE MR. WHITE ON BOTH PLAINTIFFS BEHALF HAS APPEALED FOR THE RELEASE OF AT LEAST THEIR MEDICAL PROPERTIES TO DEFENDANTS LEONE, GARCIA, MOORE AND BARTH TO NO AVAIL AS COMPlicit IN THE VIOLATIONS THEY EACH HAVE PURPOSEFULLY FAILED TO ACT TACTICALLY ORDAINING THE ABUSES.

106. FROM A INMATES PREVENTABLE DEATH CAUSED IN 2020 BY DEFENDANT LEONG, HE AND MR. WHITE HAD A HOSTILE AND ADVERSARIAL RELATIONSHIP. FOLLOWING MR. WHITE'S SEGREGATION DEFENDANT LEONG AS THE UNIT SUPERVISOR WAS REPEATEDLY MADE AWARE OF MR. WHITE'S NEED FOR HIS MEDICAL PROPERTY AND REBUFFED IT OUT OF ANIMOSITY AND HOSTILITY AGAINST MR. WHITE. INCITING UNIT UNREST AGAINST MR. WHITE DEFENDANT LEONG ADVISED ADJACENT 6P INMATES OPENLY THAT MR. WHITE WAS PROTECTIVE CUSTODY CAUSING DEATH THREATS, RIDICULE, TAUNTING AND HARASSMENT. FOLLOWING A UNIT FIRE IN WHICH LEONG ATTEMPTED TO SUFFOCATE A PRISONER IN MR. WHITE'S VIEW ON APRIL 11, 2022, A ENORMOUS AMOUNT OF SMOKE AND RETARDANT DRIPTED TO MR. WHITE'S CELL AREA RENDERING HIM INCAPABLE OF BREATHING DUE TO HIS ASTHMA. HE SOUGHT FRESH AIR AND THAT A INHALER BE OBTAINED FROM MEDICAL OR HIS PROPERTY. LEONG ADVISED MR. WHITE "FUCK YOU ITS NOT MY PROBLEM. SHUT THE FUCK UP ITS PRISON." WHEN MR. WHITE VOWED TO GRIEVE LEONG HE ADVISED "YOU MAY NOT BE ALIVE TO SEE YOUR PROPERTY PUNK!" MR. WHITE SUFFERS TERRIFYING ASTHMA ATTACKS AND LABORED BREATHING EPISODES AS A RESULT. FEARING FOR HIS IMMEDIATE SAFETY AND LIFE MR. WHITE SOUGHT ASSISTANCE FROM DEFENDANTS MOORE, YATES AND MCKEEHAM ALL WHO TO PLAINTIFF WHITE'S DETRIMENT TURNED A BLIND EYE REFUSING TO ACT OR EVEN MERELY INQUIRE INTO THE BASIS OF HIS CONCERNS.

107. UNDER DEFENDANTS OPERATIONS PROCEDURES AND ADMINISTRATIVE REGULATIONS 507 AND 711 INMATES PLACED IN SEGREGATION TYPICALLY ARE ACCOMPANIED BY THEIR PROPERTY OR AT THE VERY MINIMUM RECEIVE IT WITH AN INVENTORY SLIP WITHIN 3 DAYS. DEFENDANTS WITHHOLDING OF PLAINTIFFS PROPERTIES IS CAPRICIOUS, MALICIOUS AND IS CALCULATED TO FRUSTRATE AND CIRCUMVENT LEGAL PROCESSES, PERPETRATE FRAUDULENT THEFTS AND FOR THE VERY PURPOSE OF CAUSING PLAINTIFFS SUFFERINGS.

108. UNIT 11 CONTAINS SOME 73+ CAMERAS WHICH ARE CONTAINED ALL OVER THE UNIT FOR MONITORING PURPOSES INCLUDING IN THE COMMON AREAS ASSOCIATED WITH THE EVENTS DESCRIBED AT PARAGRAPHS 32-34, 39-43, 46, 49, 51, 63, 70-71, 73-81, 86, 89-99, 101-102 AND 106, SUPRA. BY ADMISSTION OF DEFENDANT BARRETT SAID FOOTAGE IS RETRIEVABLE UP TO TWO-YEARS PRIOR CONSIDERING THE TIME, DATE AND LOCATION IS PROVIDED. IN WHICH TO PREVENT SPONTANEOUS OR COINCIDENTAL FRAUDULENT SPOILIATION OF THIS CRUCIAL EVIDENCE PLAINTIFFS PRIOR TO SERVING THIS COMPLAINT ANTICIPATE DIRECTING FORMAL REQUESTS FOR EVIDENCE PRESERVATION RELEVANT TO THIS ACTION.

109. ALL DEFENDANTS AS EMPLOYEES OF THE NDOC WERE ON NOTICE AND SERVED UPON EMPLOYMENT NDOC AR 339 (EMPLOYEE CODE OF ETHICS AND CONDUCTS, CORRECTIVE OR DISCIPLINARY ACTION, PROHIBITIONS AND PENALTIES) OF THE EXPECTATIONS EXPECTED OF THEM AS PROFESSIONALS CHARGED WITH THE CUSTODY OF PLAINTIFFS AND OTHER PRISONERS AND THEIR STERN ADHERENCE TO THE CODE OF ETHICS AND DESPITE SUCH RESENTFULLY DISREGARDED THESE LEGAL RESPONSIBILITIES AND DUTIES TO THE DETRIMENT OF PLAINTIFFS AND THEIR HUMAN, CIVIL AND CONSTITUTIONAL RIGHTS. RATHER THAN REPORTING, WITHOUT RESERVATION, THE CORRUPTION OF ROGUE EMPLOYEES, THEY EACH ACQUIESCED, TACITLY APPROVED AND ENTERED INTO AN ACTIVE CONSPIRACY TO PERPETUATE FRAUD AND A COVER UP IN ADMINISTRATIVE LEGAL PROCEEDINGS AND CIRCUMVENT AND OBSTRUCT THE DUE COURSE OF JUSTICE BEFORE THIS AND OTHER COURTS.

110. DEFENDANTS ACTIONS, CONDUCTS, INDIVIDUALLY AND CONCERTEDLY WERE GRAVELY OFFENSIVE, CALCULATED, MALICIOUS, CAPPICIOUS, SADISTIC, CALLOUS, ABUSIVE, DISCRIMINATORY, HORRIFYING, PROVOCATIVE AND WITH DISREGARD AND COMPLETE INSENSITIVITY TO PLAINTIFFS HUMAN, CIVIL, CONSTITUTIONAL AND PROPERTY RIGHTS, STATE AND FEDERAL LAW, NDOC REGULATIONS AND THE RIGHTS AND ENTITLEMENTS OF ADVERSELY IMPACTED THIRD-PARTIES.

111. AS A DIRECT PROXIMATE RESULT OF THE DEFENDANTS ACTIONS, INACTIONS, MISTREATMENTS, ABUSES, VIOLATIONS, OFFENSES, OMISSIONS, CONSPIRACIES AND COVER UPS, PLAINTIFFS WERE INJURED IN THEIR PERSONS, PSYCHES AND PROPERTIES AND SUFFERED ACTUAL INJURIES AND DAMAGES. DEFENDANTS EVIL AND FRAUDULENT DEEDS WERE THE PROXIMATE RESULT AND CAUSE OF THOSE INJURIES, DAMAGES AND HUMAN, CIVIL, PROPERTY AND CONSTITUTIONAL RIGHTS VIOLATIONS.

VI. LEGAL CLAIMS

112. FOR PURPOSES OF ALL LEGAL CLAIMS, PLAINTIFFS REINCORPORATE BY REFERENCE PARAGRAPHS I THRU III, INCLUSIVE, AS IF FULLY SET FORTH AT AND IN EACH RESPECTIVE FEDERAL AND STATE LEGAL CLAIM.

A. FEDERAL

CLAIM I (42 U.S.C. § 1983) BY BOTH PLAINTIFFS AS AGAINST DEFENDANTS JOHNSON, RIVAS, JACKSON, LOPEZ, STEWART, BARRETT OBLAK, ASHCRAFT, MARTINEZ, GARCIA, BERNALES, VILCARRA-RODRIGUEZ, ONTIVEROS, JARRETT, SALKOFF, WILLIAMS, DON DOE, NURSE DOES AND OTHER DOES

US CONSTITUTION, AMENDMENT 1 RETALIATION, INTERFERENCE WITH COURT ACCESS AND RIGHT TO PETITION GOVERNMENT FOR REDRESS OF GRIEVANCE.

113. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED CONDUCTS OF THESE DEFENDANTS VIOLATED PLAINTIFFS RIGHTS AS GUARANTEED UNDER THE FIRST AMENDMENT TO THE U.S. CONSTITUTION AS THEY ACTIVELY INTERFERED WITH AND OBSTRUCTED PLAINTIFFS ABILITY TO PETITION GOVERNMENT FOR REDRESS OF GRIEVANCE AND MEANINGFULLY ACCESS COURTS WITHOUT RETALIATION OR INTERFERENCE AND SAID ACTIONS FRUSTRATED PLAINTIFFS EFFORTS CAUSING THEM HARM TO THEIR PERSONS, HEALTHS AND FIRST AMENDMENT RIGHTS WERE EFFECTIVELY CHILLED.

CLAIM II (42 U.S.C. § 1983) BY MS. DIXON AS AGAINST DEFENDANTS RIVAS, JARRETT, JACKSON, LOPEZ-MAYA, STEWART, BARRETT OBLAK, ASHCRAFT, MARTINEZ, GARCIA, LEONE, BARTH, MOORE, DON DOES, NURSE DOES AND OTHER DOES.

U.S. CONSTITUTION, AMENDMENT 8 - DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL CONDITIONS, INTERFERING WITH PRESCRIBED CARE.

114. AS ALLEGED ABOVE MS. DIXON SUBMITS THAT THE DESCRIBED CONDUCTS OF THESE DEFENDANTS VIOLATED HER RIGHTS AS GUARANTEED UNDER THE EIGHTH AMENDMENT TO THE U.S. CONSTITUTION AS THEY CONSTITUTED DELIBERATE INDIFFERENCE TO HER SERIOUS MEDICAL CONDITIONS AND/OR ACTIVE INTERFERENCE WITH HER PRESCRIBED CARE WHICH RESULTED AND CONTINUES TO RESULT IN HER WANTON SUFFERING OF PAIN AND INJURY TO HER PERSON AND HEALTH.

CLAIM III (42 U.S.C. § 1983) BY MR. WHITE AS AGAINST DEFENDANTS RIVAS, JARRETT, ONTIVEROS, WILLIAMS, LOPEZ-MAYA, BARRETT ABEL, BERNALES, VIZCARRA-RODRIGUEZ, JACKSON, STEWART, OBLAK, MARTINEZ, LEUNG, GARCIA, BARTH, MOORE NURSE DOES, PHARMACY DOES, DON DOE AND OTHER DOES.

U.S. CONSTITUTION, AMENDMENT 8, DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL CONDITIONS, INTERFERING WITH PRESCRIBED CARE.

115. AS ALLEGED ABOVE MR. WHITE SUBMITS THAT THE DESCRIBED CONDUCTS OF THESE DEFENDANTS VIOLATED HIS RIGHTS AS GUARANTEED UNDER THE 8TH AMENDMENT TO THE U.S. CONSTITUTION AS THEY CONSTITUTED DELIBERATE INDIFFERENCE TO HIS SERIOUS MEDICAL CONDITIONS AND/OR ACTIVE INTERFERENCE WITH HIS PRESCRIBED CARE WHICH RESULTED AND CONTINUES TO RESULT IN HIS WANTON SUFFERING OF PAIN AND INJURY TO HIS PERSON AND HEALTH.

CLAIM IV (42 U.S.C. § 1983) BY MR. WHITE AS AGAINST DEFENDANTS PHARMACY DOES, ABEL, O'CONNOR, DOE NURSES AND OTHER DOES.

U.S. CONSTITUTION, AMENDMENT 8, DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL/PSYCHIATRIC CONDITIONS, INTERFERING WITH PRESCRIBED CARE.

116. AS ALLEGED ABOVE MR. WHITE SUBMITS THAT THE DESCRIBED CONDUCTS OF THESE DEFENDANTS VIOLATED HIS RIGHTS AS GUARANTEED UNDER THE 8TH AMENDMENT TO THE U.S. CONSTITUTION AS THEY CONSTITUTED DELIBERATE INDIFFERENCE TO HIS SERIOUS MENTAL HEALTH CONDITIONS AND/OR ACTIVE INTERFERENCE WITH HIS PRESCRIBED CARE WHICH RESULTED IN HIS WANTON SUFFERING OF PAIN AND INJURY TO HIS PERSON, HEALTH AND MENTAL HEALTH.

CLAIM V (42 U.S.C. § 1983) BY MR. WHITE AS AGAINST DEFENDANTS DENTAL DOES AND OTHER DOES.

U.S. CONSTITUTION, AMENDMENT 8, DELIBERATE INDIFFERENCE TO SERIOUS AND PAINFUL DENTAL CONDITIONS.

117. AS ALLEGED ABOVE MR. WHITE SUBMITS THAT THE DESCRIBED CONDUCTS OF THESE DEFENDANTS VIOLATED HIS RIGHTS AS GUARANTEED UNDER THE 8TH AMENDMENT TO THE U.S. CONSTITUTION AS THEY CONSTITUTED DELIBERATE INDIFFERENCE TO HIS SERIOUS AND PAINFUL DENTAL CONDITIONS WHICH RESULTED AND CONTINUES TO RESULT IN HIS WANTON SUFFERING OF PAIN AND INJURY TO HIS PERSON AND HEALTH.

CLAIM VI (42 U.S.C. § 1983) BY BOTH PLAINTIFFS AS AGAINST DEFENDANTS ONTIVEROS, BARRETT, JARRETT, ASHCRAFT, LOPEZ-MAYA, WILLIAMS, SALKOFF, SANCHEZ, OBIAK, MARTINEZ, JACKSON, LOUVERTURE AND DOES IN ADDITION TO YATES, LEONE AND MCKEEHAM.

U.S. CONSTITUTION, AMENDMENT 8 - DELIBERATE INDIFFERENCE TO PERSONAL SAFETY, FAILURE TO PROTECT.

118. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED CONDUCTS OF THESE DEFENDANTS VIOLATED THEIR RIGHTS AS GUARANTEED UNDER THE 8TH AMENDMENT TO THE U.S. CONSTITUTION AS THEY CONSTITUTED DELIBERATE INDIFFERENCE TO PLAINTIFFS PERSONAL SAFETIES AND A FAILURE TO PROTECT WHICH RESULTED AND CONTINUES TO RESULT IN THE SUFFERING OF PAIN AND INJURY TO THEIR PERSONS, HEALTHS AND VIOLATIONS OF THEIR CONSTITUTIONAL RIGHTS.

CLAIM VII (42 U.S.C. § 1983) BY MR. WHITE AS AGAINST DEFENDANTS LOPEZ-MAYA, ASHCRAFT, BARRETT, SANCHEZ, ONTIVEROS, JOHNSON, TORRES, BEAN, WILLIAMS (MATOUSEK), PECCININI, WILLIAMS AND DOES

U.S. CONSTITUTION, AMENDMENT 8 - DELIBERATE INDIFFERENCE TO PERSONAL SAFETY, FAILURE TO PROTECT.

119. AS ALLEGED ABOVE MR. WHITE SUBMITS THAT THE DESCRIBED CONDUCTS OF THESE DEFENDANTS VIOLATED HIS RIGHTS AS GUARANTEED BY THE 8TH AMENDMENT TO THE U.S. CONSTITUTION AS THEY CONSTITUTED DELIBERATE INDIFFERENCE TO HIS PERSONAL SAFETY AND A FAILURE TO PROTECT WHICH RESULTED IN THE SUFFERING OF PAIN AND INJURY TO HIS PERSON AND HEALTH.

CLAIM VIII (42 U.S.C. § 1983) BY BOTH PLAINTIFFS AS AGAINST DEFENDANTS TORRES, SARLETT, BARRETT, SALKOFF, WILLIAMS, SANCHEZ, ONTIVEROS, FINLEY AND DOES

U.S. CONSTITUTION, AMENDMENT 8, 'DELIBERATE INDIFFERENCE TO PERSONAL SAFETY,' FAILURE TO PROTECT.

120. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED CONDUCTS OF THESE DEFENDANTS VIOLATED THEIR RIGHTS AS GUARANTEED BY THE 8TH AMENDMENT TO THE U.S. CONSTITUTION AS THEY CONSTITUTED DELIBERATE INDIFFERENCE TO THEIR PERSONAL SAFETIES AND A FAILURE TO PROTECT WHICH RESULTED IN THE SUFFERING OF MENTAL ANGUISH, DISTRESS AND INJURY TO THEIR PERSON, HEALTH AND PSYCHE.

CLAIM IX (29 U.S.C. § 794; 42 U.S.C. § 12101, ET. SEQ) BY BOTH PLAINTIFFS AS AGAINST DEFENDANTS STATE OF NEVADA, JACKSON, LOPEZ-MAYA, STEWART, BARRETT, OBLAK, ASHCRAFT, MARTINEZ, GARCIA, MOORE, BARTH, JOHNSON, LEONE AND DOES

121. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED CONDUCTS OF THESE DEFENDANTS VIOLATED THEIR RIGHTS AND GUARANTEES AS SET FORTH IN THE REHABILITATION AND AMERICANS WITH DISABILITIES ACTS IN WHICH AS QUALIFIED DISABLED PERSONS DEFENDANTS REFUSED TO MAKE ESSENTIAL ACCOMMODATIONS WARRANTED BY SAID DISABILITIES. PLAINTIFFS WERE DENIED AND EXCLUDED FROM PROGRAMS, ACTIVITIES BENEFITS AND SERVICES OF DEFENDANTS AND THEIR PUBLIC ENTITY ON ACCOUNT OF THEIR DISABILITIES.

CLAIM X (42 U.S.C. § 1983) BOTH BOTH PLAINTIFFS AS AGAINST DEFENDANTS STATE OF NEVADA, WILLIAMS, SALKOFF, SANCHEZ, JACKSON, ASHCRAFT, LOPEZ-MAYA, MARTINEZ, OBLAK AND DOES.

U.S. CONSTITUTION, AMENDMENT 14, DENIAL OF EQUAL PROTECTION, TREATMENT AND BENEFIT UNDER THE LAW.

122. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED CONDUCTS OF THESE DEFENDANTS VIOLATED THEIR RIGHTS AS GUARANTEED UNDER THE 14TH AMENDMENT TO THE U.S. CONSTITUTION AS DEFENDANTS GENDER MOTIVATED SEXUAL ORIENTATION BIAS'S AND RESENTMENT, HATRED AND HOSTILITIES DEMONSTRATE BY THEIR ETCHED SLOGANS "FAGS," "HOMOS" "FLM" AND OTHERS THAT PLAINTIFFS WERE TARGETTED IN WHOLE OR IN PART AND SINGLED OUT BY DEFENDANTS FOR THE RECKLESS DESTRUCTION AND DESERATION OF THEIR CELL AND PROPERTIES MERELY ON ACCOUNT OF THEIR SEXUAL ORIENTATIONS.

B. STATE

CLAIM XI - ASSAULT AND BATTERY BY BOTH PLAINTIFFS AS AGAINST DEFENDANTS ONTIVGROS, BARRETT, JARRETT, ASHCRAFT, LOPEZ-MAYA, WILLIAMS, SALKOFF, SANCHEZ, OBLAK, MARTINEZ, JACKSON, LOUVEPTURE AND DOES

123. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED CONDUCTS, ACTIONS, INACTIONS, OMISSIONS OF THESE DEFENDANTS DIRECTLY INCITED, CREATED THE ATMOSPHERE FOR, TACITLY ENCOURAGED, ENDORSED AND ORDAINED THE ASSAULT AND BATTERY BROUGHT UPON PLAINTIFFS BY INMATE JOSHUA JOHNSON. DEFENDANTS ACTIONS WERE THE DIRECT CONTRIBUTING AND PROXIMATE CAUSE OF PLAINTIFFS ASSAULT AND BATTERYS AND RESULTED IN PERSONAL HARM AND INJURYS AS ALLEGED ABOVE.

CLAIM XII - ASSAULT AND BATTERY BY MR. WHITE AS AGAINST DEFENDANTS ONTIVGROS, BARRETT, JARRETT, ASHCRAFT, LOPEZ-MAYA, TORRES, WILLIAMS, SANCHEZ, JOHNSON, BEAN, PICCINI, WILLIAMS (MATOUSEK), AND DOES

124. AS ALLEGED ABOVE MR. WHITE SUBMITS THAT THE DESCRIBED CONDUCTS, ACTIONS, INACTIONS, OMISSIONS OF THESE DEFENDANTS DIRECTLY INCITED, CREATED THE ATMOSPHERE FOR, TACITLY ENCOURAGED, ENDORSED AND ORDAINED THE ASSAULT AND BATTERY AND STABBING BROUGHT UPON HIM BY THE ASSAULT AND BATTERY BROUGHT ABOUT BY INMATE DOMINGUEZ' INCITATION. DEFENDANTS ACTIONS WERE THE DIRECT CONTRIBUTING AND PROXIMATE CAUSE OF PLAINTIFFS ASSAULT AND BATTERY AND RESULTED IN HIS PERSONAL HARM AND INJURYS AS ALLEGED ABOVE.

CLAIM XIII - DEFAMATION / SLANDER / LIBEL
AS AGAINST DEFENDANTS BERNALES, RIVAS,
AND VIZCARRA-RODRIGUEZ BY MR. WHITE

125. AS ALLEGED ABOVE MR. WHITE SUBMITS THAT THE DESCRIBED CONDUCTS AND ACTIONS OF THESE DEFENDANTS IN FALSELY, MALICIOUSLY DOCTOPING AND FRAUDULENTLY INDUCING AND INCLUDING FALSE SLANDEROUS, LIBELOUS AND DEFAMATORY ENTRIES INTO MR. WHITES MEDICAL RECORD AND FOR PUBLIC VIEWING IN FEDERAL COURT FILINGS CONSTITUTE DEFAMATION/SLANDER AND LIBEL UNDER COMMON LAW. DEFENDANTS ACTIONS AND ACCUSATIONS WERE PATENTLY FALSE AND SUBJECTED MR. WHITE TO INTERRUPTION OF HIS CARE, RIDICULE, SHAME, EMBARRASSMENT REJECTION, SHUN AND INSURED HIM IN HIS CHARACTER AND REPUTATION.

CLAIM XIV - GROSS NEGLIGENCE BY BOTH
PLAINTIFFS AS AGAINST DEFENDANTS JOHNSON,
RIVAS, JARRETT, JACKSON, LOPEZ-MAYA, STEWART,
BARRETT, OBLAK, ASHCRAFT, MARTINEZ, CARTA,
ONTIVEROS, WILLIAMS, WILLIAMS (MATOUSEK), BER-
NALES, VIZCARRA-RODRIGUEZ, ABEL, O'CONNOR,
TORRES, SANCHEZ, BEAN, PICCININI, SALKOFF, LOWER-
TURE, LEONE, MOORE, BARTH, YATES, MCKEEHAM,
FINLEY, DENTAL DOES, NURSE DOES, DON DOE AND
OTHER DOES

126. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED CONDUCTS AND ACTIONS OF THESE DEFENDANTS IN INTERACTING WITH AND VIOLATING THE RIGHTS OF PLAINTIFF CONSTITUTED GROSS NEGLIGENCE UNDER COMMON LAW AS DEFENDANTS FAILED TO USE REASONABLE CARE AND CONSIDERATION IN THEIR DEALINGS WITH PLAINTIFFS AS WOULD BE TAKEN BY ANY REASONABLE PERSON OF ORDINARY PRUDENCE. PLAINTIFFS WERE INJURED BY DEFENDANTS GROSS NEGLIGENCE AND SUFFERED HARM AND SUFFERINGS. DEFENDANTS LACK OF DUE CARE PROXIMATELY CAUSED PLAINTIFFS HARMS AND INJURIES.

CLAIM XV - CONVERSION OF PROPERTY BY BOTH PLAINTIFFS AS AGAINST DEFENDANTS LOPEZ-MAYA, ASHCRAFT, GARCIA, SALKOFF, JACKSON, OBLAK, MARTINEZ, LEONE, MOORE, BARTH, STATE OF NEVADA AND DOES.

127. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED CONDUCTS AND ACTIONS OF THESE DEFENDANTS IN SEIZING AND DAMAGING AND OTHERWISE UNLAWFULLY WITHHOLDING PLAINTIFFS PROPERTIES WITHOUT PROVISION OF DUE PROCESS AND FOR STATE GAIN AND BENEFIT WITHOUT JUST COMPENSATION TO PLAINTIFFS CONSTITUTE CONVERSION UNDER COMMON LAW.

CLAIM XVI - INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS BY BOTH PLAINTIFFS AND AS AGAINST DEFENDANTS JOHNSON, RIVAS, BARRETT, JACKSON, LOPEZ-MAYA, STEWART, BARRETT, OBLAK, ASHCRAFT, MARTINEZ, GARCIA, WILLIAMS, WILLIAMS (MATOUSEK), BERNALES, VIZCARRA-RODRIGUEZ, ONTIVEROS, ABEL, O'CONNOR TORRES, SALKOFF, SANCHEZ, BEAN, PIZZININI, LOWERTURE, LEONE, BARTH, MOORE, YATES, FINLEY, DON DOE, PHARMACY DOES, DENTAL DOES, DOE NURSES AND OTHER DOES

128. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED OF ACTIONS AND CONDUCTS OF THESE DEFENDANTS CAUSED PLAINTIFF THE INFLECTION OF EMOTIONAL DISTRESS, WANTON SUFFERINGS AND PAIN. DEFENDANTS ACTIONS AND CONDUCT WAS THE PROXIMATE CAUSE OF SAID SUFFERINGS AND PLAINTIFFS WERE INJURED IN THEIR PERSONS AS A RESULT.

CLAIM XVII - DESTRUCTION OF EVIDENCE, FRAUD, FRAUDULENT CONCEALMENT, OBSTRUCTION OF JUSTICE BY BOTH PLAINTIFFS AS AGAINST DEFENDANTS JOHNSON, BARRETT, RIVAS, BERNALES, VIZCARRA-RODRIGUEZ, ONTIVEROS, SALKOFF, OBLAK, ASHCRAFT, JACKSON, MARTINEZ, WILLIAMS, WILLIAMS (MATOUSEK), LOPEZ-MAYA, BARRETT, SYDIONCO, FINLEY, DOE NURSES, DON DOE AND DOES.

129. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED OF ACTIONS AND CONDUCTS OF THESE DEFENDANTS WERE DEEBERATE, INTENTIONAL AND MALICIOUS ACTS IN WHICH THEY PURPOSEFULLY MADE FRAUDULENT ENTRIES INTO OFFICIAL ADMINISTRATIVE AND COURT RECORDS AND FRAUDULENTLY CONCEALED, PURPOSEFULLY DESTROYED AND/OR PLANTED PHYSICAL EVIDENCE BY IN WHICH TO OBSTRUCT THE DUE COURSE OF JUSTICE AND PERPETUATE FRAUD UPON NDOC AND THIS COURT BY ORDAINING SAID FRAUDULENT REPORTS AND FOR THE VERY PURPOSE OF OBSTRUCTING ANY RESULTING ADMINISTRATIVE INVESTIGATIONS AND JUSTICE AND TO OTHERWISE PURPOSEFULLY DEPRIVE PLAINTIFFS OF DUE PROCESS OF LAW.

CLAIM XVIII - PROFESSIONAL MALPRACTICE BY BOTH PLAINTIFFS AS AGAINST DEFENDANTS VIZCARRA-RODRIGUEZ, DOC NURSES AND OTHER DOES.

130. AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED OF ACTIONS AND CONDUCTS OF THESE DEFENDANTS UNDER OATHION LAW CONSTITUTED PROFESSIONAL MALPRACTICE. THESE DEFENDANTS OWED PLAINTIFFS A RESPONSIBILITY AND DUE CARE TO CONPORT WITH ALL LICENSING PRACTICES OF NURSING AND TO PROCEED AND TREAT PLAINTIFFS WITH AND USE ORDINARY DEGREE OF SKILL AND CARE AS WOULD AND IS TO BE EXPECTED FROM ANY ORDINARY LIKE PRUDENT PERSON OF NORMAL SENSIBILITY IN THE SAME PROFESSION. DEFENDANTS FAILED TO USE THAT DEGREE OF SKILL AND CARE BREACHING THAT DUTY OWED PLAINTIFFS TO PLAINTIFFS DETRIMENT AND WHICH RESULTED IN PLAINTIFFS INJURIES AND SUFFERINGS.

CLAIM XIX - MEDICAL MALPRACTICE BY BOTH PLAINTIFFS AS AGAINST DEFENDANTS RIVAS, BERNALES, VIZCARRA-RODRIGUEZ, ABEL, OCONNOR, MEDICAL, DENTAL AND NURSING DOES

AS ALLEGED ABOVE PLAINTIFFS SUBMIT THAT THE DESCRIBED OF ACTIONS AND CONDUCTS OF THESE DEFENDANTS UNDER OATHION LAW CONSTITUTED MEDICAL MALPRACTICE. THESE DEFENDANTS OWED PLAINTIFFS A RESPONSIBILITY AND DUE CARE TO CONPORT WITH ALL LICENSING PRACTICES OF NURSING, DOCTORING, DENTAL AND PSYCHOLOGY AND TO PROCEED AND TREAT PLAINTIFFS WITH AND USE ORDINARY DEGREE OF SKILL AND CARE AS WOULD BE AND IS TO BE EXPECTED FROM ANY ORDINARY LIKE PRUDENT PERSON OF NORMAL SENSIBILITY IN THE SAME PROFESSION. DEFENDANTS FAILED TO USE THAT DEGREE OF SKILL AND CARE BREACHING THAT DUTY OWED PLAINTIFFS TO PLAINTIFFS DETRIMENT AND WHICH RESULTED IN PLAINTIFFS INJURIES AND SUFFERINGS.

VII. PRAYER FOR RELIEF:

WHEREFORE PLAINTIFFS RESPECTFULLY MOVE THIS COURT FOR RELIEF AS FOLLOWS:

1). THAT THE COURT ISSUE A DECLARATORY JUDGMENT THAT THE ACTIONS, INACTIONS, OMISSIONS, POLICIES, REGULATIONS AND CONDUCTS DESCRIBED WITHIN THE INSTANT COMPLAINT ARE BOTH OFFENSIVE TO AND VIOLATE INTERNATIONAL LAW, HUMAN, CIVIL AND CONSTITUTIONAL RIGHTS OF PLAINTIFFS AND VARIOUS STATE AND FEDERAL LAWS AND DEFENDANTS OWN ADMINISTRATIVE REGULATIONS AND OPERATIONS PROCEDURES;

2). THAT THE COURT ISSUE ADEQUATE AND EFFICIENT INJUNCTIVE RELIEF AS MAY BE APPLIED FOR BY PLAINTIFFS DURING THE COURSE OF THIS ACTION NECESSARY FOR THE PRESERVATION OF LIFE, PREVENTION OF ARBITRARY, INHUMANE AND WANTON UNNECESSARY SUFFERINGS AND PAINS AND IN WHICH TO PRESERVE THE STATUS QUO DURING THE PENDENCY OF THIS ACTION;

3). COMPENSATORY DAMAGES OF \$1,500,000.00;

4). NOMINAL DAMAGES OF \$1.00;

5). PUNITIVE DAMAGES OF \$350,000.00;

6). TRIAL BY JURY ON ALL MATTERS TRIABLE BY JURY;

7). SUCH OTHER AND FURTHER RELIEF AS THE COURT MAY DEEM JUST, FAIR AND EQUITABLE INCLUDING PLAINTIFFS REIMBURSEMENTS OF ALL COSTS ASSOCIATED WITH THE COMMENCEMENT, PROSECUTION AND CONCLUSION OF THIS ACTION.

VIII. DECLARATION

BOTH PLAINTIFFS S. SCARAH DIXON AND JONAY A WHITE, III, BEING SWORN UNDER OATH UNDER THE LAWS OF THE STATE OF NEVADA AND UNITED STATES HEREBY ATTEST THAT THE ABOVE IS TRUE AND CORRECT.

BY:


(S. SCARAH DIXON)

DATED: ~~APRIL 17TH~~ 2022

JULY 19, 2022

PLAINTIFF IN PRO SE

JULY 19, 2022
DATED: ~~APRIL 17, 2022~~

BY: 
(C. A. WHITE, III)
CO-PLAINTIFF IN PRO SE